# **EXHIBIT A**

En	or Stanting Potentia	Dogun and P	Do aumont Dor	Confidentiality	Disintiff-!	Disintiffet Ewhite Down	Defender to	Defendants! Exhibit D	Plaintiffe! Objections	Defendante! P	Defendante! Objections	District Degrees
Filir Ord	g Starting Bates No.	Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
000			Excel file	HC-AEO	Flo Custodian for	Proof of total number of users	Lorin Hitt	Relevant to defending Plaintiffs' CIPA	-		Relevance; MIL	The exhibit is relevant (see Rules 401, 402).
	through FLO- 00106857_0019				Authentication	and resulting damages.		632 claim			By Google & Meta: Hearsay; Personal Knowledge	The MIL is opposed.
												Exhibit will be properly authenticated (see Rule 901).
											By Google: Authenticity  By Meta: Probative Value	Balance favors admissibility (see Rules 401, 403).
											Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0002		7/6/2023	print-out of https://flo.health		Google Custodian						Relevance; Hearsay; Authenticity;	The exhibit is relevant (see Rules 401, 402).
	through GOOG-FLO- 00095202				for Authentication	breach of contract and CMIA claim.					Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												Exhibit will be properly authenticated (see Rule 901).
000		Unknown	Frequently Asked Questions - F	lo	Flo Custodian for	Proof of Flo's liability for	R. Bugaev; L. Lydon	To provide relevant information about			Relevance	The exhibit is relevant (see Rules 401, 402).
	FLO-00003362		Customer Support.pdf		Authentication	breach of contract and CMIA claim.		the Flo app and to rebut Plaintiff's claims and request for damages.	defense	various features of the app and ways in which users can interact with the app, which		Balance favors admissibility (see Rules 401, 403).
										in turn are relevant to	Outweighed, WIE	The MIL is opposed.
0004	FLO-00101059 through	Unknown	Translated Conversation with		Dmitry Gursky	Proof of Flo's liability for				rebutting Plaintiffs' claims	Relevance: Hearsay: No Certified	The exhibit is relevant (see Rules 401, 402).
000	FLO-00101104	Chanown	Dmitry Gursky		Dinary Guisky	CMIA claim.					Translation	
											By Meta: Probative Value	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											Outweighed; Character; Authenticity; Personal Knowledge;	Balance favors admissibility (see Rules 401, 403).
											MIL	Exhibit will be properly authenticated (see Rule 901).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)
												The MIL is opposed.
												Will present certified translation and/or translator as a witness.
000	n/a	5/3/2024	Flo App Analysis Report of S.	n/a	Serge Egelman	Proof of Defendants' liability	S. Egelman; G.	Relevant to Absence of Eavesdropping,			Improper Expert Opinion; MIL;	Proper expert opinion/report. See ECF No. 597
			Egelman, Ph.D.		88	for breach of contract, CMIA,	Zervas	Expert Cross-Examination			Hearsay; Relevance; Personal	
						CIPA, invasion of privacy.					Knowledge; Character; Inadmissible Expert Report;	MIL is opposed.
											Original Required	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												The exhibit is relevant (see Rules 401, 402).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)
												Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0000	5 FLO-00001891 through	Unknown	iPhone screen shots of Flo app		Flo Custodian for	Proof of Flo's liability for					Relevance; MIL; Probative Value	The exhibit is relevant (see Rules 401, 402).
300	FLO-00001899		intake screens		Authentication	CMIA and invasion of privacy;					Outweighed	
						proof of Google and Meta's liability for CIPA.					By Google & Meta: Hearsay;	Balance favors admissibility (see Rules 401, 403).
											Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											By Google: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).

Balance favors admissibility (see Rules 401, 403).

File Order Order Order Order FLO-00001885 through FLO-0001890  FLO-0001885  FLO-0001885  Unknown  FLO-0001885  Unknown  G: Susame Schumacher Depo Tr Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Third Parties  Flo Custodian for Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Vol. 1 - Ex. 147 (HC-AEO) P. Chart of Flo Dats Shared with Vol. 1 - Ex. 147 (HC-AEO) P. Ch	
FLO-00001885 through FLO-0001885 through FLO-0001885 through FLO-0001885 Unknown  FLO-0001885 Unknown  FLO-0001885 Unknown  FLO-00001885 through FLO-00001885 through FLO-00001885 Unknown  FLO-000018	
Susame Schumacher Schu	
By Google & Meta: Hearsay; Personal Knowledge; Authenticity  By Google & Meta: Hearsay; Personal Knowledge; Authenticity  Bulance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Relevance; MIL; Probative Value Outweighed  The exhibit is relevant (see Rules 401, 402).  CMIA, breach of contract, and invasion of privacy; proof of the MIL is opposed.	
CIPĂ.  CIPĂ.  CIPĂ.  CIPĂ.  Personal Knowledge; Authenticity  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Relevance; MIL; Probative Value Outweighed  The exhibit is relevant (see Rules 401, 402).  CMIA, breach of contract, and invasion of privacy; proof of privacy; proof of the MIL is opposed.	
Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Relevance; MIL; Probative Value Outweighed  Outweighed  The MIL is opposed.	
Exhibit will be properly authenticated (see Rule 901).  Unknown  G: Susanne Schumacher Depo Tr Vol. 1 - Ex. 147 (HC-AEO) P: Chart of Flo Data Shared with  Washing the properly authenticated (see Rule 901).  Relevance; MIL; Probative Value Outweighed  The AEO Outweighed  The MIL is opposed.	
FLO-0001885 Unknown G: Susanne Schumacher Depo Tr Vol. 1 - Ex. 147 (HC-AEO) P: Chart of Flo Data Shared with Susanne Shared with Shared with Susanne Shared with Susanne Shared with Susanne Shared with Susanne Shared with Shared with Susanne Shared with Share	
Vol. 1 - Ex. 147 (HC-AEO) P: Chart of Flo Data Shared with  Authentication; CMIA, breach of contract, and invasion of privacy; proof of  The MIL is opposed.	
P: Chart of Flo Data Shared with Susanne invasion of privacy; proof of The MIL is opposed.	
Third Parties Schumacher Google and Meta's liability for By Google & Meta: Hearsay;	
CIPA.  CIPA.  Balance favors admissibility (see Rules 401, 403).	
Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).	
Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).	
Exhibit will be properly authenticated (see Rule 901).	
0009 n/a 6/28/2024 Expert Rebuttal Report of S. n/a Serge Egelman Proof of Defendants' liability S. Egelman; G. Relevant to Absence of Eavesdropping, - Improper Expert Opinion; Hearsay; Proper expert opinion. See ECF No. 597	
Egelman, Ph.D. for breach of contract, CMIA, Zervas Expert Cross-Examination Relevance; MIL; Personal	
CIPA, invasion of privacy.  Knowledge; Inadmissible Expert Report; Original Required  MIL is opposed.	
Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).	
The exhibit is relevant (see Rules 401, 402).	
Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).	
Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)	
0010 FLURRY FRASCO 000 6/17/2016 Flurry "iOS SDK Instructions" Bisera Ferrero: Proof of Flo's liability for	
460 through Nathalie Owen CMIA, breach of contract, and Personal Knowledge; Probative	
FLURRY_FRASCO_000 Value Outweighed Balance favors admissibility (see Rules 401, 403).	
Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).	
Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).	
Exhibit will be properly authenticated (see Rule 901).	
0011 GOOG-FLO-00037788 Unknown "Get Started with Google Google Custodian Proof of Defendants' liability Proof of Defendants' liability The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be establishes (see Rul	
through GOOG-FLO- 00037789  Analytics for Unity" on the for Authentication 00037789  Hearsay 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will of authenticated (see Rule 901)  CIPA, invasion of privacy.	will be properly
00037789   Firebase website   CIPA, invasion of privacy.   authenticated (see Rule 901)  By Flo: Authenticity	
0012 META-FRASCO- Unknown Facebook Ads Tool "Solutions Confidential Meta Custodian for Proof of Defendants' liability Relevance; Hearsay The exhibit is relevant (see Rules 401, 402);	
0000027936 through Guide" Authentication for breach of contract, CMIA,	
META-FRASCO- By Flo: Personal Knowledge; Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902);	
0000027943 Exhibit will be properly authenticated (see Rule 901).  0013 META-FRASCO- Unknown "Facebook App Events" n/a Meta Custodian for Proof of Defendants' liability  Hearsay Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); the exhibit is rele	
Wile A Francisco (Superating Option Processing Vision Contract, CMIA,  When A Francisco (Superating Option Processing Op	
META-FRASCO- By Flo: Relevance; Personal authenticated (see Rule 901).	will be properly
0000002975 Knowledge; Authenticity	
0014 GOOG-FLO-00077646 Unknown Google Analytics > Measurement HC-AEO Google Custodian Proof of Defendants' liability    Google Analytics > Measurement HC-AEO Google Custodian Proof of Defendants' liability   The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be establishes (see Rules 401, 402); foundation/personal knowledge will be establishes (see Rules 401, 402); foundation/personal knowledge will be establishes (see Rules 401, 402); foundation/personal knowledge will be establishes (see Rules 401, 402); foundation/personal knowledge will be established to the control of the control	
through GOOG-FLO- Android > "Log Events"   for Authentication   for breach of contract, CMIA,   CIPA, invasion of privacy.	will be properly
1/647  CIPA, invasion of privacy.  By Flo: Authenticity  By Flo: Authenticity	
0015 FLURRY_FRASCO_000 7/8/2022 https://developer.yahoo.com/fl Flurry Custodian for Proof of Flo's liability for Relevance; Hearsay; Personal The exhibit is relevant (see Rules 401, 402).	
102 through uny/ docs/ analytics/ Authentication CMIA, breach of contract, and Knowledge; Authenticity; Probative	
FLURRY_FRASCO_000   gettingstmted/ events/ android/   value Outweighed   value Outweighed	
105 "Custom Events with Flurry Analytics for Android" Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).	
Exhibit will be properly authenticated (see Rule 901).	

### Joint Preliminary Trial Exhibit List

Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD)

Filing Order	Starting Bates No.	Document Dat	Document Description Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0016	META-FRASCO-	Unknown	HE and a de Ann Francis Occasions of	Witness	Proof of Defendants' liability					П	Nethernoon (as Del 2011) and a horse constitue of the Con
0016	0000003019 through	Unknown	"Facebook App Events Overview n/a An overview of the app events in	Meta Custodian for Authentication	for breach of contract, CMIA,					Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly
	META-FRASCO-		Facebook Analytics# Facebook		CIPA, invasion of privacy.					By Flo: Relevance; Personal	authenticated (see Rule 901).
	0000003020		App Events"							Knowledge; Authenticity	
0017	FLURRY_FRASCO_000	7/8/2022	https://developer.yahoo.com/fluny		Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402).
	046 through FLURRY FRASCO 000		/docs/analytics/lexicon/eventsbest practice/#fluny-custom-events-	Authentication	CMIA, breach of contract, and invasion of privacy.					Knowledge; Authenticity; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	051		best-practices		invasion of privacy.					value dativeigned	
			"Flurry Custom Events: Best Practices"								Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			Tractices								Exhibit will be properly authenticated (see Rule 901).
											Balance favors admissibility (see Rules 401, 403)
0018	GOOG-FLO-00019736	6/11/2020	Email chain between Google and Confidential	Brian Kennedy;	Proof of Defendants' liability					MIL; Relevance; Personal	The MIL is opposed; the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see
	through GOOG-FLO-		FTC	Morgan Kennedy	for violation of CMIA, CIPA,					Knowledge; Hearsay; Probative	Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see
	00019739				breach of express contract, and/or invasion of					Value Outweighed	Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					privacy/intrusion upon					By Flo: Authenticity	
					seclusion; proof rebutting Defendants' affirmative						
					defenses						
0019	META-FRASCO- 0000003379 through	2/15/2019	Email chain between Facebook Confidential and Wall Street Journal	KatyDormer; Susan Glick	Proof of Defendants' liability for breach of contract, CMIA,					MIL; Personal Knowledge; Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902);not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); the exhibit is
	META-FRASCO-		and wan breet yournar	Girck	CIPA, invasion of privacy;					By Flo: Authenticity; Relevance	relevant (see Rules 401, 402); (re: probative value) balance favors admissibility (see Rules 401, 403); not improper
	0000003383				Proof rebutting Defendants' affirmative defenses.					By Meta: Probative Value	character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
					arminative delenses.					Outweighed; Character	
0020	META-FRASCO-	12/13/2019	Meta's Response to FTC's HC-AEO	M. G. F. C	Proof of Defendants' liability					MI DI DIS VI	V. I. ( D. 1.001) I/ I. ( D. 1.002.004.007) I. 1777 I. ( D. 1.002.004.007)
0020	0000001147 through	12/13/2019	Meta's Response to FTC's November 7, 2019 Civil	Authentication;	for breach of contract, CMIA,						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); the exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly
	META-FRASCO- 0000001148		Investigative Demand, dated December 13, 2019	Tobias Wooldridge	CIPA, invasion of privacy.					Hearsay; Cumulative / Duplicative	authenticated (see Rule 901); (re: probative value) balance favors admissibility (see Rules 401, 403); not improper
	0000001148		December 13, 2019		Proof rebutting Defendants'					By Flo: Authenticity	character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
					affirmative defenses					D. W. Cl.	
0021	n/a	4/20/2023	Defendant Google's Fourth	Kevin Lam	Proof of Flo's liability for					By Meta: Character By Flo: Authenticity	Exhibit will be properly authenticated (see Rule 901).
			Supplemental Responses to		breach of contract, CMIA, and						
			Plaintiffs' Interrogatories, Set One, dated April 20, 2023		invasion of privacy; proof of Google's liability for CIPA.					By Flo & Meta: Relevance; Personal Knowledge; Hearsay; MII	The exhibit is relevant (see Rules 401, 402).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0022	FLURRY FRASCO0010	Unknown	Chart showing Flo data sent to	Flurry Custodian for	Proof of Flo's liability for					Relevance; Probative Value	The MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
322	08_0001 through		Flurry	Authentication	breach of contract, CMIA, and					Outweighed; Personal Knowledge;	
	FLURRY_FRASCO0010 08 0199				invasion of privacy.					Hearsay; Authenticity; MIL	Balance favors admissibility (see Rules 401, 403).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											Exhibit will be properly authenticated (see Rule 901).
											MIL is opposed.
0023	FLURRY_FRASCO0010 09 0001 through	Unknown	Chart showing Flo data sent to Flurry	Flurry Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and					Relevance; Probative Value Outweighed; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402).
	FLURRY_FRASCO0010		Tituty	Audichication	invasion of privacy.					Hearsay; Authenticity; MIL	Balance favors admissibility (see Rules 401, 403).
	09_0090										Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											Exhibit will be properly authenticated (see Rule 901).
L											MIL is opposed.
	*					•		*	•	•	

Filing	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
0024	META-FRASCO-	12/4/2019	Summary of App Events Sent	HC-AEO	Meta Custodian for	Proof of Plaintiffs' damages						t; Balance favors admissibility (see Rules 401, 403); The exhibit is relevant (see Rules 401, 402); Foundation/personal
	0000001167		from the Flo Health App (App ID 1478610232441385) to	1	Authentication	claims					Relevance; Personal Knowledge; Hearsay	knowledge will be established (see Rules 201, 602, 901, 902); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901).
			Facebook (December 9, 2017			Proof of Defendants' liability						applies (see Nates 603, 601, 607), Exhibit will be properly authenticated (see Nate 501).
			through December 4, 2019), as of December 4, 2019	f		for breach of contract, CMIA, CIPA, invasion of privacy.					By Flo: Authenticity	
0025	FLO-00072765	9/17/2018	Russian to English Translation of	Ī.	Roman Bugaev;	Proof of Flo's liability for					Relevance; Hearsay; Probative	The exhibit is relevant (see Rules 401, 402).
			internal Flo email chain about Apps Flyer and Google Analytics		Max Scrobov; Vladislav Zhukov	breach of contract, CMIA, and invasion of privacy; proof of					Value Outweighed; MIL	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Apps Flyer and Google Analytics	'	v iadisiav Zilukov	Google's liability for CIPA.					By Flo: No certified translation	Not nearsay (see Rule 801) and/or nearsay exception applies (see Rules 805, 804, 807).
											Dec Consider & Motor December	Balance favors admissibility (see Rules 401, 403).
											By Google & Meta: Personal Knowledge	The MIL is opposed.
											By Google: Authenticity	Will present certified translation and/or translator as a witness.
											By Google. Authenticity	·
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0026	FLO-00072766	9/17/2018	Russian to English Translation of internal Flo email chain about		Roman Bugaev; Max Scrobov;	Proof of Flo's liability for breach of contract, CMIA, and					Relevance; Hearsay; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).
			"Feed Analytics" "events on		Vladislav Zhukov	invasion of privacy; proof of					value Outweighed, WIL	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Android" for the "iOS team" and the "contract with P&G."			Google's liability for CIPA.					By Flo: No certified translation	Delever former device Wilter (or a Delev 401, 402)
			the "contract with P&G."								By Google & Meta: Personal	Balance favors admissibility (see Rules 401, 403).
											Knowledge	The MIL is opposed.
											By Google: Authenticity	Will present certified translation and/or translator as a witness.
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0027	FLO-00072768	9/14/2018	Russian to English Translation of internal Flo email chain about		Roman Bugaev; Darya Palianskaya	Proof of Flo's liability for breach of contract, CMIA, and					Relevance; Hearsay; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).
			events for Google Analytics		Darya Pananskaya	invasion of privacy; proof of					value Outweighed; MIL	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Google's liability for CIPA.					By Flo: No certified translation	
											By Google & Meta: Personal	Balance favors admissibility (see Rules 401, 403).
											Knowledge	The MIL is opposed.
											By Google: Authenticity	Will present certified translation and/or translator as a witness.
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0028	FLO-00105126	12/31/2019	Russian to English Translation of		Orlova, Tamara	Proof of Flo's liability for				+	Relevance; Hearsay; Probative	The exhibit is relevant (see Rules 401, 402).
			KPMG spreadsheet about Flo			breach of contract, CMIA, and					Value Outweighed; MIL	Nickey 2007 (co. Bull 2011) and for home providing and long (co. Bull 2002 2004 2007)
			Health and P&G prepared for year end Dec. 31, 2019			invasion of privacy.					By Flo: No certified translation	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											Dec Carala & Mater December	Balance favors admissibility (see Rules 401, 403).
											By Google & Meta: Personal Knowledge	The MIL is opposed.
											By Google: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0029	n/a	9/14/2022	Flo Health Inc.'s Responses and		Susanne	Proof of Flo's liability for					Hearsay; Relevance; Probative	The exhibit is relevant (see Rules 401, 402).
			Objections to Plaintiffs' First Set of Interrogatories, dated		Schumacher	breach of contract, CMIA, and invasion of privacy; proof of					Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			September 14, 2022			Google's and Meta's liability						
						for CIPA.						Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Date	e Document Description Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose Defendants' Sponsoring Witness Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
				Witness					
0030	FLO-00001902 through FLO-00001906	3/29/2019	Wilson Sonsini letter to NYS DFS "Re: February 27, 2019	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and			Relevance; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).
			Letter to Flo Health, Inc.," dated	NYSDFS	invasion of privacy; proof of				Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			March 29, 2019	Representative	Google's and Meta's liability for CIPA; rebutting affirmative defenses.			By Google & Meta: Hearsay; Personal Knowledge	Balance favors admissibility (see Rules 401, 403).
								By Google: Authenticity	The MIL is opposed.
								By Meta: Completeness	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
									Exhibit will be properly authenticated (see Rule 901).
0004	TT 0 00004000 1	0.40.2040	7770 177 0	77. 0 . 1. 0					Contains all parts that in fairness ought to be considered at the same time.
0031	FLO-00001929 through FLO-00001934	9/18/2019	Letter to FTC "Re: Supplemental Response to Civil Investigative	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and			MIL; Relevance; Probative Value Outweighed; Cumulative /	The exhibit is relevant (see Rules 401, 402).
			Demand FTC Matter No. 1923133"		e invasion of privacy; proof of Google's and Meta's liability			Duplicate	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					for CIPA; rebutting affirmative defenses.			By Google & Meta: Hearsay; Personal Knowledge	Balance favors admissibility (see Rules 401, 403).
								By Meta: Completeness	The MIL is opposed.
								By Weta. Completeness	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
									Contains all parts that in fairness ought to be considered at the same time.
									Exhibit is not cumulative or duplicative.
0032	FLO-00072422 through FLO-00072437	4/8/2019	Flo email chain with Bayer "Re: Bayer/Flo: analytical tools usage"	Roman Bugaev; Arvid Vismont	Proof of Flo's liability for breach of contract, CMIA, and			Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).
	120 000/213/		Sayes 1 to analytical tools usage	THE VISION	invasion of privacy; proof of				Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					Google's and Meta's liability for CIPA.			By Google & Meta: Hearsay; Personal Knowledge	Balance favors admissibility (see Rules 401, 403).
								By Google: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
								By Meta: Character	Exhibit will be properly authenticated (see Rule 901).
									Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609).
0033	n/a	1/30/2023	Defendant Meta Platforms, Inc.'s	Tobias Wooldridge				Hearsay; MIL; Duplicative of P	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Supplemental Responses and Objections to Plaintiffs'		breach of contract, CMIA, and invasion of privacy; proof of			165, P 193, P 198	The exhibit is relevant (see Rules 401, 402).
			Interrogatory Nos. 1, 9, and 11,		Meta's liability for CIPA.			By Flo & Meta: Relevance	
			dated January 30, 2023					By Flo: Personal Knowledge,	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
								Authenticity	Exhibit will be properly authenticated (see Rule 901).
0034	META-FRASCO- 0000025148 through	6/28/2019	[IDFA Ranking Model Resilience HC-AEO 2019 H1 Retro] Part 1 -	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA,			Relevance; Hearsay; Personal Knowledge; Probative Value	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly
	META-FRASCO-		Overview, Impact, Challenges,		CIPA, invasion of privacy.			Outweighed; MIL	authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); MIL is opposed; Exhibit will be properly
	0000025205		Results, Limitations, and Future Directions"		Proof rebutting Defendants'			By Flo: MIL; Authenticity	authenticated (see Rule 901).
0035	META-FRASCO-	12/13/2019	Meta's Response to FTC's HC-AEO	Meta Custodian for	affirmative defenses Proof of Flo's liability for			MIL; Relevance; Personal	MIL is opposed.
	0000001149 through META-FRASCO-		November 7, 2019 Civil Investigative Demand, dated	Authentication	breach of contract, CMIA, and invasion of privacy; proof of			Knowledge; Hearsay; Cumulative / Duplicative	The exhibit is relevant (see Rules 401, 402).
	0000001153		December 13, 2019		Meta's liability for CIPA.			By Flo: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
								By Meta: Probative Value Outweighed; Character	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
								Outweighten, Character	Exhibit will be properly authenticated (see Rule 901).
									Balance favors admissibility (see Rules 401, 403).
									Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609).
									Not duplicative/cumulative.
	•			•		*			

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0036	GOOG-FLO-00082872 through GOOG-FLO- 00082889	7/23/2019	Translation of e-mails in Russian (July 23, 2019-September 17, 2019) between Google (Maria Volchenok, Nikita Strelnikov) and Flo (Anna Kitaevskaya, Evgenia Olerinskaya, Kseniya Kurchych) re Flo's Google Ads	HC-AEO	Witness Evgenia Olerinskaya; Maria Volchenok; Anna Kitaevskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Personal Knowledge; Hearsay By Flo: Authenticity; No Certified Translation; Original Required By Google: Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); will present certified translation and/or translator as a witness; document is original or exception applies (see, e.g., Rules 1003, 1004, 1007); exhibit is relevant (see Rules 401, 402)
0037	GOOG-FLO-00090971 through GOOG-FLO- 00090981	11/8/2018	Internal Google email chain "Re: [XP_UID] Gold XP_UID on the GA Mobile App" set of protections we can put in place that makes that go away."		Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901)
0038	GOOG-FLO-00092676 through GOOG-FLO- 00092678	Unknown	Firebase Auth & Google Analytics for Firebase	HC-AEO	Steve Ganem; Kevin Lam	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; proof to rebut affirmative defenses.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0039	n/a	1/4/2023	Plaintiff Autumn Meigs' Supplemental Responses and Objections to Defendant Flo Health Inc.'s Interrogatories		Autumn Meigs	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's			By Flo: Authenticity Hearsay; Personal Knowledge By Flo & Meta: Relevance (partial) By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).
0040		1/19/2023	Plaintiff Erica Frasco's Supplemental Responses and Objections to Defendant Flo Health Inc.'s Interrogatories		Erica Frasco	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability	E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's				Exhibit will be properly authenticated (see Rule 901).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).
0041		1/18/2023	Plaintiff Jennifer Chen's Supplemental Responses and Objections to Defendant Flo Health, Inc.'s Interrogatories	Confidential	Jennifer Chen	for CIPA.  Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs			By Flo: Authenticity Hearsay; Personal Knowledge By Flo & Meta: Relevance (partial) By Flo: Authenticity	Exhibit will be properly authenticated (see Rule 901).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0042		1/31/2023	2023-01-31 Sarah Wellman's Amended Supplemental R&Os to Flo ROGs (Confidential)	Confidential	Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs	-		Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0043		1/23/2023	2023-01-23 Tesha Gamino's Supplemental R&Os to Flo Health's ROGs (Confidential)	Confidential	Tesha Gamino	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Cross-Examination of the Named Plaintiffs			Hearsay; Personal Knowledge  By Flo & Meta: Relevance (partial)  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0044	FLO-00049071 through FLO-00049109	Unknown	Plaintiff Chen's Flo App logged information with Flo		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL By Google & Meta: Authenticity By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.

use of the Flo App.

By Meta: Hearsay

Exhibit will be properly authenticated (see Rule 901).

MIL is opposed.

Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).

### Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD)

Filing	Starting Bates No.	Document D	ate Document Description   Confidence	entiality Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order	Starting Dates No.	Document D	Designa	ation Sponsoring	riamuns Exmon rurpose	Sponsoring Witness	Defendants Exhibit Furpose	Framith's Objections	Defendants Response	Defendants Objections	ramuns response
15	FLO-00016295 through	Unknown	Plaintiff Frasco's Flo App logged	Witness Flo Custodian for	Proof of Flo's liability for					Relevance; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402).
	FLO-00016379		information with Flo	Authentication	breach of contract, CMIA, and	l				Probative Value Outweighed; MIL	
					invasion of privacy; proof of						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					Google's and Meta's liability for CIPA; proof of Plaintiff's					By Google & Meta: Authenticity	Balance favors admissibility (see Rules 401, 403).
					use of the Flo App.					By Meta: Hearsay	Summer investments (see times 101, 105).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Exhibit will be properly authenticated (see Rule 901).
											Example will be properly additionable (see Nate 501).
											MIL is opposed.
6	FLO-00028110 through FLO-00028197	Unknown	Plaintiff Gamino's Flo App logged information with Flo	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and					Relevance; Personal Knowledge; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).
	FLO-00028197		logged information with Fio	Authentication	invasion of privacy; proof of	1				Flobative value Outweighed, MIL	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					Google's and Meta's liability					By Google & Meta: Authenticity	7 1 11 (,,
					for CIPA; proof of Plaintiff's					D. M II	Balance favors admissibility (see Rules 401, 403).
					use of the Flo App.					By Meta: Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											(
											Exhibit will be properly authenticated (see Rule 901).
											MIL is opposed.
17	FLO-00016381 through	Unknown	Plaintiff Meigs's Flo App logged	Flo Custodian for	Proof of Flo's liability for					Relevance; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402).
	FLO-00016509		information with Flo	Authentication	breach of contract, CMIA, and	1				Probative Value Outweighed; MIL	
					invasion of privacy; proof of Google's and Meta's liability					By Google & Meta: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					for CIPA; proof of Plaintiff's					By Google & Meta. Authenticity	Balance favors admissibility (see Rules 401, 403).
					use of the Flo App.					By Meta: Hearsay	
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Exhibit will be properly authenticated (see Rule 901).
											MIL is opposed.
8	FLO-00028102 through FLO-00028109	Unknown	Plaintiff Wellman's Flo App logged information with Flo	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and					Relevance; Personal Knowledge; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).
	FLO-00028109		logged information with Fio	Authentication	invasion of privacy; proof of	1				Frobative value Outweighed, WILL	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					Google's and Meta's liability					By Google & Meta: Authenticity	
					for CIPA; proof of Plaintiff's use of the Flo App.					By Meta: Hearsay	Balance favors admissibility (see Rules 401, 403).
					use of the Fio App.					By Mcta. Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Exhibit will be properly authenticated (see Rule 901).
											MIL is opposed.
19	FLO-00049111 through	Unknown	Plaintiff Chen's Flo App Data	Flo Custodian for	Proof of Flo's liability for					Relevance; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402).
	FLO-00057221		sent to Flo	Authentication	breach of contract, CMIA, and	l				Probative Value Outweighed; MIL	
					invasion of privacy; proof of Google's and Meta's liability					By Google & Meta: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					for CIPA; proof of Plaintiff's					By Google & Wett. Authenticity	Balance favors admissibility (see Rules 401, 403).
					use of the Flo App.					By Meta: Hearsay	
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Exhibit will be properly authenticated (see Rule 901).
	TT 0 0000 1		DI LIMB A F		n a am						MIL is opposed.
0	FLO-00004576 through FLO-00016294	Unknown	Plaintiff Frasco's Flo App Data sent to Flo	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and					Relevance; Personal Knowledge; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).
	1 20-00010274		Sout to 1 to	Authentication	invasion of privacy; proof of	·				1 100auve value Outweigheu; MIL	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
					Google's and Meta's liability					By Google & Meta: Authenticity	
					for CIPA; proof of Plaintiff's use of the Flo App.					By Meta: Hearsay	Balance favors admissibility (see Rules 401, 403).

Filing	Starting Bates No.	Document Date			ntiffs'	Plaintiffs' Exhibit Purpose	Defendants' Ex	thibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation Spor Witr	nsoring ness		Sponsoring Witness					
0051	FLO-00028199 through FLO-00049070	Unknown	Plaintiff Gamino's Flo App data sent to Flo		Custodian for nentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL By Google & Meta: Authenticity By Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0052	FLO-00016510 through	Unknown	Plaintiff Meigs's Flo App Data	Flo	Custodian for	Proof of Flo's liability for					Relevance; Personal Knowledge;	Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
	FLO-00025623		sent to Flo	Auth	entication	breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Probative Value Outweighed; MIL By Google & Meta: Authenticity By Meta: Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0053	FLO-00026002 through FLO-00028101	Unknown	Plaintiff Wellman's Flo App Data sent to Flo		Custodian for nentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; proof of Plaintiff's use of the Flo App.					Relevance; Personal Knowledge; Probative Value Outweighed; MIL By Google & Meta: Authenticity By Meta: Hearsay	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0054	META-FRASCO- 0000028530	5/4/2018	"Signals FYI # Data Retention & Controls Update 5/4 Here is an overview of various offsite data retention and controls related work streams to be aware of "		a Custodian for nentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay; Personal Knowledge  By Flo & Meta: Relevance  By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); Exhibit will be properly authenticated (see Rule 901).
0055	n/a	6/27/2022	Defendant Flurry LLC's Objections and Responses to Plaintiffs' First Set of Interrogatories, dated June 27, 2022	Biser	ra Ferrero	ammative declars as a second proof of Flo's liability for breach of contract, CMIA, and invasion of privacy.					Relevance; Personal Knowledge; Authenticity; Hearsay; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0056	FLO-00094934	Unknown	Russian to English Translation of "Integration requirements for Amplitude" list	Max	Scrobov	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy.					MIL; Relevance; Hearsay  By Flo: No Certified Translation; Original Required; Subsequent Remedial Measures	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not subsequent remedial measures and/or exception applies (see Rule 407).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0057	FLO-00095249 through FLO-00095279		"Flo Monthly Reporting"		ara Orlova	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.					Relevance; MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
0058	FLO-00025650 through FLO-00025653		"MINUTES OF A REGULAR MEETING OF THE BOARD OF DIRECTORS OF FLO HEALTH, INC."	Auth	Custodian for entication	Proof of damages.					Relevance By Flo: MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
0059	FLO-00025778 through FLO-00025829	6/16/2021	"Flo Health Group Consolidated Financial Statements as at and for the year ended 31 December 2020" by KPMG		Custodian for nentication	Proof of damages.					Relevance By Flo: MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).

Filing Order	Starting Bates No.	Document Da	ate Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose D S	efendants' ponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0060	GOOG-FLO-00081317 through GOOG-FLO- 00081318	2/20/2019	Russian to English Translation of email chan "[FLO] Re: FLO / Google meeting follow-up"	f HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Authenticity; Original Required	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); document is original or exception applies (see, e.g., Rules 1003, 1004, 1007)
0061	GOOG-FLO-00081575 through GOOG-FLO- 00081600	Unknown	"FLO // Google 2019 Plan Proposal - Executive Summary" PPT	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity; MIL	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); the MIL is opposed
0062	META-FRASCO- 0000001218 through META-FRASCO- 0000001238	9/10/2019	Flo/ Facebook email chain "Re: New Facebook Account Manager for Flo Health"	HC-AEO	Brianna Arroyo	Proof of Plaintiffs' damages claims; Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay  By Flo: Personal Knowledge; Authenticity; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0063	META-FRASCO- 0000021055 through META-FRASCO- 0000021060	2/27/2020	Email chain: "Subject: Re: Urgent issues on Facebook."	Confidential	Alex Bagdasarov	Proof of Plaintiffs' damages claims; Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Hearsay  By Flo: Personal Knowledge; Authenticity  By Meta: Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); MIL opposed.
0064	GOOG-FLO-00081659- 81659	5/29/2019	[3-6316000026511] Advertiser - FLO, Health & Fitness category, period tracker; Markets - US; (Case 3-6316000026511)"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo & Meta: Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0065	GOOG-FLO-00084738- 84740	9/23/2020	Email chain "Re: [0- 0512000030037] - Personalized Ads policy - 807-232-5127"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0066	META-FRASCO- 0000001157	12/13/2019	Meta's Response to FTC's November 7, 2019 Civil Investigative Demand, dated December 13, 2019	HC-AEO	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy; Proof rebutting Defendants' affirmative defenses					MIL; Relevance; Personal Knowledge; Hearsay By Flo: Authenticity By Google & Meta: Probative Value Outweighed By Meta: Character; Cumulative / Dunlicative	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); Not duplicative.
0067	n/a	5/3/2024	Expert Report of Jennifer Golbeck, dated May 3, 2024.		Jennifer Golbeck	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorization.					1	; Proper expert opinion/report. See ECF No. 597  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
0068	GOOG-FLO-00088918 through GOOG-FLO- 00088924	9/11/2018	GOOG-FLO-00088918	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.	Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo: Personal Knowledge; Authenticity; Hearsay; Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); not hearsay (see Rule 801) and/or hearsay exception (see Rules 803, 804, 807); balance favors admissibility (see Rules 401, 403), the exhibit is relevant (Rules 401, 402)
0069	GOOG-FLO-00078297 through GOOG-FLO- 00078300	10/20/2020	"Re: Mobile [8-7303000031030] Campaign is only serving text assets"	HC-AEO	Maria Volchenok	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance; Personal Knowledge; Hearsay  By Flo: Authenticity; MIL	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); the MIL is opposed
0070	GOOG-FLO-00064255 through GOOG-FLO- 00064278	3/20/2020	GA4F SDK-'- AC Comm doc 'Project Uno"	HC-AEO	Steve Ganem; Kevi Lam	n Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Personal Knowledge; Hearsay  By Flo: Authenticity  By Google: Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); the exhibit is relevant (see Rules 401, 402)
0071	FLO-00003020 through FLO-00003023	6/15/2016	Flo Health Privacy Policy 6-15- 2016 (FLO-00003020)		Flo Health Custodian for Authentication	breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA	Schumacher; M. crobov; C. arkanias; Named ainitffs; L. Lydon; aintiffs' Experts	To establish Flo's affirmative defenses including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization			Agreed	N/A

Joint Preliminary Trial Exhibit List	
Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD	)

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response Defendants' C	Objections	Plaintiffs' Response
0072	FLO-00003046 through FLO-00003052	11/15/2016	Flo Health Privacy Policy 11-15- 2016(FLO-00003046)		Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Agreed		N/A
0073	FLO-00002816 through FLO-00002822	12/21/2016	Flo Privacy Policy (archived), effective as of December 21, 2016		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization		Agreed		N/A
0074	FLO-00002942 through FLO-00002947	3/14/2017	OwHealth, Inc. Privacy Policy, effective as of March 14, 2017		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-	Agreed		N/A
0075	FLO-00002948 through FLO-00002953	3/17/2017	Flo Health Privacy Policy 3-17- 2017 (FLO-00002948)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's 'CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization		Agreed		N/A
0076	FLO-00002779 through FLO-00002785	7/12/2017	Flo Health Privacy Policy 7-12- 2017 (FLO-00002779)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's 'CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization		Agreed		N/A
0077	FLO-00003039 through FLO-00003045	8/28/2017	Flo Health Privacy Policy, effective as of August 28, 2017	Confidential			S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-	which we sugg with depositio	tive of Frasco 147 gest using to keep n exhibit numbers and o admissibility for.	
	FLO-00002975	11/13/2017	Flo Health Privacy Policy 11-13- 2017 (FLO-00002969)			breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-	which we sugg with depositio would agree to	tive of Ridgway 85 gest using to keep n exhibit numbers and o admissibility for.	
0079	FLO-00002815	5/25/2018	OwHealth, Inc. Privacy Policy, effective as of May 25, 2018	Confidential		breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Consent, Relevant to License Defense	-	suggest using deposition exh would agree to	way 29 which we to keep with hibit numbers and to admissibility for.	
0080	FLO-00003007 through FLO-00003019	7/16/2018	Flo Privacy Policy, effective as of July 16, 2018	f Confidential		Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	Karkanias; Named Plainitffs; L. Lydon;	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's 'CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	which we sugg with depositio	tive of Wellman 66 gest using to keep n exhibit numbers and o admissibility for.	
0081	FLO-00097992 through FLO-000098004	8/6/2018	Flo Health Privacy Policy 8-6- 2018 (FLO-00002877)		Flo Health Custodian for Authentication; Timofei Savitski	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Agreed		N/A
0082	FLO-00003024 through FLO-00003038	2/19/2019	Flo Privacy Policy, effective as of February 19, 2019		Flo Health Custodian for Authentication		S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Agreed		N/A

Filing Order	Starting Bates No.	Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections Defendants' Response	Defendants' Objections	Plaintiffs' Response
0083	FLO-00002976 through FLO-00002988	2/23/2019	Flo Health Privacy Policy 2-23- 2019 (FLO-00002976)		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's CIPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Agreed	N/A
0084	FLO-00002749 through FLO-00002761	2/27/2019	Flo Health Privacy Policy 2-27- 2019		Flo Health Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta's and Google's CIPA violations were without authorizatoion.	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plainitffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiff's CiPA 632 claim; Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Agreed	N/A
0085	FLO-00098363 through FLO-000098364	9/27/2018	Email from Flo Support to strl30l2@byui.edu re Question on Private Policy	Confidential	Valeriya Silenkova	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.	Flo Witness	Relevant to Consent, Relevant to License Defense		By Flo: Personal Knowledge; Hearsay; Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
0086		6/17/2021	Complaint, In the Matter of Flo Health Inc., FEDERAL TRADE COMMISSION, No. 1923133 https://www.ftc.gov/system/files/ documents/cases/flo_health_comp laint.pdf		FTC Representative Flo Representative	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google.				MIL; Relevance; Probative Value Outweighed; Hearsay; Personal Knowledge By Flo: Authenticity By Meta: Character	The MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).  Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)
0087	GOOG-FLO-00057395 through GOOG-FLO- 000057396	6/19/2019	Re: Firebase / S2S instead of SDK / FLO	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; proof of damages, including punitive.				Relevance; Personal Knowledge; Hearsay By Flo: Authenticity	exception applies (Kutes 807, 806, 609)  The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0088	GOOG-FLO-00057418 through GOOG-FLO- 000057420	6/25/2019	"Re: Firebase / S2S instead of SDK / FLO"	HC-AEO	Steve Ganem	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; proof of damages, including numitive.				Relevance; Personal Knowledge; Hearsay By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0089	META-FRASCO- 0000001171 through META-FRASCO- 0000001173	3/12/2019	Flo email chain "Re: Should CO3BOHMTbC51"	Confidential	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses				Personal Knowledge; Relevance  By Flo & Meta: Hearsay; No Certified Translation; MIL  By Flo: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Will present certified translation and/or translator as a witness; MIL is opposed; Exhibit will be properly authenticated (see Rule 901).
0090	META-FRASCO- 0000004236 through META-FRASCO- 0000004237	5/11/2020	"Message summary [{"otherUserFbld": null, "threadFbld":234 7242988712092}]"	HC-AEO	Julia Onuchina	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses				Hearsay, Probative Value Outweighed; Personal Knowledge; Relevance By Flo: Authenticity By Meta: Character	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Balance favors admissibility (see Rules 401, 403; Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); Exhibit will be properly authenticated (see Rule 901); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
0091	FLO-00106587 through FLO-0000106589	4/17/2023	FTC notice release process, https: //ow health. atlassian. net/ wiki/ pages/ viewpage. action 'pa geld=340413 6520&pa ge Version=2		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of nonauthorization for Plaintiffs' CIPA claims against Meta and Google; rebutting affirmative defenses.				by Meta: Character Relevance; Personal Knowledge; MIL; Probative Value Outweighed By Google & Meta: Hearsay	The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).

Filing Order	Starting Bates No.	Document Date	te Document Description Confid		Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0092	FLO-00104570 through FLO-0000104573	3/13/2017	OwHealth, Inc. Terms of Service, n/a published March 13, 2017 (and in	Witness Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon	S. Schumacher; M. Scroboy; C.	To establish Flo's affirmative defenses, including consent, and rebut all of	-		Agreed	
	120-00001043//3		effect through July 11, 2017)	radicinteation	seclusion, and breach of contract claims; Proof rebutting Defendants' affirmative defenses	Karkanias; Named	Plaintiff's claims; Relevant to Consent, Relevant to License Defense				
0093	FLO-00104580 through FLO-0000104585	11/15/2017	Flo Terms of Service, published n/a November 15, 2017 (and in effect through November 27, 2017)	Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims, Proof rebutting Defendants' affirmative defenses	S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to Consent, Relevant to License Defense	-		Agreed	
0094	FLO-00067608 through FLO-000067639	Unknown	Flo PPT: "The World's First AI- Powered Super App"	Sergey Vasilyev; Roman Bugaev	Proof of Flo's liability for CMIA and invasion of privacy; proof of damages.					Relevance; Hearsay  By Flo: MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											The MIL is opposed.
0095	FLO-00076557 through FLO-000076565	Unknown	Flo Longterm Subscriptions (1).pdf	Tamara Orlova	Proof of Flo's liability for CMIA, invasion of privacy, and					Relevance; MIL	The exhibit is relevant (see Rules 401, 402).
					breach of contract; proof of damages.					By Flo: Probative Value Outweighed	Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.
0096	FLO-00106148 through FLO-0000106150	10/12/2020	Flo (Ow Health) "Your Monthly Debrief: Dr. Staci T on Birth	Flo Custodian for Authentication	Proof of Flo's liability for CMIA.					Relevance, Probative Value Outweighed, MIL	The exhibit is relevant (see Rules 401, 402).
			Control, Most Popular Community Discussions, Menstrual Cycle Length Research"								Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.
0097	GOOG-FLO-00072497 through GOOG-FLO- 000072499	Unknown	Google Analytics Help "About Demographics and Interests"	GO Google Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of					Relevance, Hearsay, Personal Knowledge	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0098	GOOG-FLO-00082938 through GOOG-FLO- 000082939	9/28/2019	"Remarketing lists disabled for use with Google Ads"	EO Evgenia Olerinskaya	Google's liability for CIPA.  Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					By Flo: Authenticity Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0099	GOOG-FLO-00090263 through GOOG-FLO- 000090278	3/18/2020	Internal Google email chain "Re: HC-AE [fatcat-taxonomic] fork: Implementation of sensitive iba in UAM"	EO Ben Ewing	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA; rebutting affirmative defenses.					Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0100	META-FRASCO- 000021051 through META-FRASCO- 0000021054	2/27/2020	certified translation of the document bates stamped META-FRASCO-000021051 showing internal Flo email chain "Re: Urgent questions regarding how does facebook work"	Alex Bagdasarov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Personal Knowledge; Authenticity; No Certified Translation; Original Required  By Meta: Probative Value	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Will present certified translation and/or translator as a witness; Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007); Balance favors admissibility (see Rules 401, 403).
0101	META-FRASCO- 0000407127 through META-FRASCO- 00000407200	12/20/2019	certified translation of the document bates stamped META-FRASCO-0000407127 showing a chat between Eugene Tiunovich (Flo) and Alex B.	ential Alex Bagdasarov	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses; Proof of Plaintiffs' damages claims					Outweighed Relevance, Hearsay  By Flo: Personal Knowledge; Authenticity; No Certified Translation; Original Required By Meta: Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Will present certified translation and/or translator as a witness; Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007); Balance favors admissibility (see Rules 401, 403).
0102	META-FRASCO- 0000369781 through META-FRASCO- 0000369784	Unknown	Identity Matching in Layman's Terms https://www. inter ma Ifb.co m/intern/wi ki/Identity-Matchi ng/Identity Business_Overview/	Meta Custodian fo Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Probative Value Outweighed, Personal Knowledge By Flo: Authenticity; Hearsay	The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0103	GOOG-FLO-00061014 through GOOG-FLO- 00061019	11/1/2019	Firebase 2020 Strategy & Priorities	HC-AEO	Steve Ganem; Kevin Lam	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's liability for CIPA.					Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit will be properly authenticated (see Rule 901)
0104	META-FRASCO- 0000025797 through META-FRASCO- 0000025801	8/10/2017; last edited 11/29/2017	App Signal Strategy & H2 2017 Roadmap	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0105	META-FRASCO- 0000027855 through 0000027859	Jul-19	Facebook, Business Tools Security Guide	Confidential	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses	Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; O. Bagdasarov	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		Personal Knowledge  By Flo: Hearsay; Authenticity; Relevance  By Meta: Subsequent Remedial Measures	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).  Not subsequent remedial measures and/or exception applies (see Rule 407).
0106	META-FRASCO- 0000000107 through 0000000113	Unknown	APP Events FAQ	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Personal Knowledge  By Flo: Hearsay; Authenticity; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0107	Flo-00001924 through 00001928	11/12/2019	Flo's letter to FTC re: Supplemental Response to Civil Investigative Demand (FTC Matter No. 1923133)		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative defenses.					Relevance, Probative Value Outweighed, Personal Knowledge; MIL By Google & Meta: Hearsay By Google: Authenticity	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0108	META-FRASCO- 0000023770 through 0000023805	End of 2021	AI for Ads MZ Deep Dive – Privacy Section	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Complete; Not subsequent remedial measures and/or exception applies (see Rule 407).
											By Meta: Probative Value Outweighed; Completeness; Subsequent Remedial Measures	
0109	META-FRASCO- 0000028537	2/28/2019	Document titled "Facebook Analytics (Deprecated Product) Q&A and Feedback"	HC AEO	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); the MIL is opposed.
0110	META-FRASCO-	7/16/2020 (last	Meta Workplace post "High Risk	k HC-AEO	Michelle Chen:	Proof of Defendants' liability					By Meta: Probative Value Outweighed; MIL Relevance, Hearsay, Personal	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803,
	0000022438 through 0000022470	edited)	Health Metadata Prevalence Deep Dive" (last edited by Michelle Chen on July 16, 2020)		Tobias Woolridge	for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants'					Knowledge  By Flo: Authenticity	804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403).
						affirmative defenses					By Meta: Probative Value Outweighed	
0111	META-FRASCO- 0000026472 through 0000026483	4/2/2019	Privacy Enhancements to FB SDK - S&I Review (4/2/19)"	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); Not subsequent remedial measures and/or exception applies (see Rule 407).
						Proof rebutting Defendants' affirmative defenses					By Meta: Probative Value Outweighed; Subsequent Remedial Measures	
0112	META-FRASCO- 0000406740 through 0000406744	4/2/2018	Internal Facebook messages	Confidential	Anh Bui	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance, Hearsay  By Flo: Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); MIL is opposed.
						Proof rebutting Defendants' affirmative defenses					By Meta: Probative Value Outweighed; MIL	

Filing Order	Starting Bates No.	Document Date	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0113	META-FRASCO- 0000003606	5/17/2019	Internal Facebook messages	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); MIL is opposed.
						Proof rebutting Defendants' affirmative defenses					By Meta: Probative Value Outweighed; MIL	
0114	META-FRASCO- 0000028913 through 0000028918	2/20/2019	Internal Facebook emails	Confidential	Victoria Chen Norland	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance, Hearsay  By Flo: Authenticity; No Certified Translation; Probative Value Outweighed; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Will present certified translation and/or translator as a witness; Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609).
											By Meta: Probative Value Outweighed; Non-certified Translation; Character	
0115	META-FRASCO- 0000027524 through 0000027528	6/8/2018	Facebook's June 8, 2018 Answers to Senate Committee Questions	n/a	Meta Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					By Flo & Meta: Hearsay; MIL; Relevance By Flo: Authenticity; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); MIL is opposed; The exhibit is relevant (see Rules 401, 402); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); not duplicative
						animative detenses					By Meta: Probative Value Outweighed; Character; Cumulative / Duplicative of P 332	
0116	META-FRASCO- 0000002161	11/23/2018	Email from A. Lapitski to M. Shaternik re Subscribe Events So up	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.	A. Lapitski	Relevant to Absence of Eavesdropping	-		By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0117	META-FRASCO- 0000024793	11/23/2018	Email (in russian) between Flo and Meta re: Subscribe Events Set up	Confidential	Alex Lapitski	affirmative defenses Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.  Proof rebutting Defendants' affirmative defenses					Interpreter  By Flo: Hearsay; Authenticity; Relevance; Probative Value Outweighed; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902). Will present certified translation and/or translator as a witness.
0118	META-FRASCO- 0000024794	11/23/2018	Emails between Flo and Facebook re: Subscribe Events Set up	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Interpreter, Hearsay, Authenticity  By Flo: Personal Knowledge; Relevance	Will present certified translation and/or translator as a witness. Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402).
0119	META-FRASCO- 0000024816 through 0000024820	1/14/2019	Emails between Flo and Facebook re: Update to Your Facebook Support	Confidential	Alex Lapitski	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					By Meta: Probative Value Outweighed Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); Balance favors admissibility (see Rules 401, 403).
0120	META-FRASCO-	5/21/2019	Email between Flo and Facebook	Confidential	Alay Lapiteki: Iulia	Proof of Defendants' liability					By Meta: Probative Value Outweighed Relevance, Hearsay	The exhibit is relevant (see Rules 401, 402); Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803,
0120	0000007890 through 0000007892	3/21/2019	re: Facebook Client Solutions Manager	Comucina	Onuchina Onuchina	for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity; Personal Knowledge	804, 807); Exhibit will be properly authenticated (see Rule 901); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0121	FLO-00094771 through FLO-00094772	12/20/2018	Email notice from Meta to Flo – fwd: Important notice from Facebook Integrity team		Max Scrobov; Maksim Shaternik	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA; rebutting affirmative					Relevance, Probative Value Outweighed By Flo: Hearsay	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						defenses.					By Meta: Personal Knowledge; MIL	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The MIL is opposed.

Part	Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Part   Section   Part		FLO-00072710	1/6/2019	Email notice from Meta to Flo -		Witness	Proof of Flo's liability for	1				Relevance, Probative Value	The exhibit is relevant (see Rules 401, 402).
Project Landers   Project La	0.22	120 000/2/10	1.0.2015			Roman Dugue							The entire to February (see Fattle 1913, 192).
Part   Continue   Co				Integrity team								n	Balance favors admissibility (see Rules 401, 403).
Bit   Section   Process   Content   Process												By Flo: Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
Second Control   Seco												By Meta: Personal Knowledge;	Total neutraly (see Natio 601) and of neutraly exception applies (see Natio 603, 601, 607).
Part												MIL	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
Big September													**
9.00000000-0	0123		3/5/2019		Confidential	Katy Dormer						Hearsay	
Part				reaction after w 53 story								By Flo: Authenticity; Subsequent	
Miller (March 1997)  Miller (M												Remedial Measures; Personal	
By Max Productive Value   Prod												Knowledge; Relevance; MIL	
March PLANCOC   15-201-3   Note of the responsibility of the first formula and the second state of the s							affirmative defenses					By Meta: Probative Value	
Developed Meas and Fibre To cell													
Company   Comp	0124		3/5/2025									Hearsay	
Proof relating problemate and substitute of the services of th				between Meta and Flo re: To call	1	Authentication						Dy Elo: Interpreter: Perconal	
Prof. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		000001170											402). Document is original of exception applies (see, e.g., rule 1003, 1004, 1007).
Company   Comp							affirmative defenses					Relevance	
Company   Comp												Dy Mata: Probativa Valua	
Production of 379/2019 email [From Florengings (Max Service) [Max Service) [Max Service] [Max Serv													
Section of a "Peer" to "UA quantum"   Section of a "Peer" to "UA quantum"   Section of a "Peer" to "UA quantum"   Section of a "Peer" to "UA quantum "Pe	0125	FLO-00094769	3/5/2025			Max Scrobov	Proof of damages, including						The exhibit is relevant (see Rules 401, 402).
Room belage (interpretire Bot Prividence   Bot December   Bot De							punitive.						
Evidence   Not hemroup (see Rade 801) and other large exception applies (see Rade 803, 804, 807).													Balance favors admissibility (see Rules 401, 403).
Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present exception applies (see, e.g., Rule 1003, 1004, 1007).  By Meta Hearnay  Proof of damages, including pentity.  By Hearnay  Proof of the Beautiful Davies of the Substitution of				question									Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007).  Will present certified translation and/or translation as a wines.  Personal Knowledge  Prof. federance, Protonic Value  Ourseighet, Subsequent Remercial  Measure  By Meta Hearnay  Not hearnay (see Rule 401, 402).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 407).  Not hearnay (see Rule 401) and/or hearnay exception applies (see Rule 401), 402).  Dainty Garski  Dainty Garski  Not Personal Knowledge  Proof of damages, including punity.  Proof of damages												Dr. Mata, Haamay	Foundation/nerconal translates will be established (see Dules 201, 602, 001, 002)
FLO-0010418 through												by Meta. Hearsay	Foundation personal knowledge will be established (see Rules 201, 002, 901, 902).
PLO-00101418 through   PLO-0010418													Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007).
0101421 Gonchar, Roman Buguev, Aliakes Staliaron, and Aliaksandr Karzbenka  Discontinuous production of the Carbon of Carbon o													Will present certified translation and/or translator as a witness.
Aliaksei Staliarou, and Aliaksandr Karzhenka  Balance favors admissibility (see Rules 401, 402).  Not bearsay (see Rule 801) and/or bearsay exception applies (see Rules 201, 602, 901, 902).  Floormalis re- Follow-up with UA strategy & plans meeting  Aliaksandr Karzhenka  Aliaksandr Karzhenka  Aliaksandr Karzhenka  Aliaksandr Karzhenka  Balance favors admissibility (see Rules 401, 403).  Not bearsay (see Rule 801) and/or bearsay exception applies (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Alternational Control of Contract, CMIA, (To bearsay for Contract, CMIA, (To beach of Contract, CMIA, (To beach	0126		3/5/2025			Roman Bugaev						Personal Knowledge	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
Aliaksandr Karzhenka  Balamce favors admissibility (see Rules 401, 403).  Not besequent remedial measures and/or exception applies (see Rules 803, 804, 807).  Not benevaly (see Rule 801) and/or benevaly exception applies (see Rules 201, 602, 901, 902).  Foundation personal knowledge will be established (see Rules 201, 602, 901, 902).  By Flor. Relevance: Personal Knowledge, Interpreter; Best Evidence  Balamce favors admissibility (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balamce favors admissibility (see Rules 201, 602, 901, 902).  The chibit is relevant (see Rules 401, 402).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translation and		00101421					punitive.					Dy Flor Dolovomon Ducketive Volv	The avhibit is relative (see Byles 401, 402)
Measures  Balance favors admissibility (see Rules 401, 403).  By Meta: Hearsay  Not subsequent remedial measures and/or exception applies (see Rule 407).  Not bearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Probative Value Outweighed  By Fior. Relevance; Personal Roweldege, interpreter; Best Evidence  META-FRASCO- 0000003374  META-FRASCO- 0000003374  META-FRASCO- 0000003374  META-FRASCO- Not bearsay (see Rule 801) and/or hearsay exception applies (see Rules 801, 804, 807).  Proof of damages, including punitive.  Max Scrobov; Dmitry Gurski  Meta Custodian for Meta Custodian for Authentication  Authentication  Proof of Defendants' liability  Meta Custodian for Authentication  Proof of Defendants' liability  Meta Custodian for Authentication  Proof rebuting Defendants'  Proof of Defendants' liability  Not subsequent remedial measures and/or exception applies (see Rule 407).  Not bearsay (see Rule 801) and/or hearsay exception applies (see Rules 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Balance													
Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Probative Value Outweighed Evidence   Probative Value Outweighed Strategy & plans meeting												Measures	Balance favors admissibility (see Rules 401, 403).
Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).    Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 201, 602, 901, 902).    Translation of 2/10/2020 internal Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strategy & plans meeting   From all Flormalister. Follow-up with UA strateg												Dy Mater Haamay	Not subsequent remodial measures and/or expention analics (see Pule 407)
Probative Value Outweighed foundation/personal knowledge will be established (see Rules 201, 602, 901, 902):    Franklation of 2/10/2020 internal Flo emails re: Follow-up with UA strategy & plans meeting												By Mcia. Hearsay	Not subsequent remedial measures and/of exception applies (see Kuie 407).
Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo emails re: Follow-up with UA strategy & plans meeting  Flo exhibit is relevant (see Rules 401, 402).  Flo exhibit is relevant (see Rules 401, 403).  Flo exhibit is relevant (see Rules 401, 403)													
strategy & plans meeting  Max Scrobov; Dmitry Gurski  By Flo: Relevance; Personal Knowledge; Interpreter; Best Evidence  By Flo: Relevance; Personal Knowledge; Interpreter; Best Evidence  By Flo: Relevance; Personal Knowledge; Interpreter; Best Evidence  Balance favors admissibility (see Rules 401, 403).  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or tran	0127		3/5/2025									Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
Dmitry Gurski   Balance favors admissibility (see Rules 401, 403).   Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)		00000729			A		punitive.					By Flo: Relevance: Personal	The exhibit is relevant (see Rules 401, 402).
Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translator as a witness.  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translator as a witness.  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translator as a witness.  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translator as a witness.  Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)  Will present certified translation and/or translator as a witness.  Not hearting (see Rule 801) and/or heasy exception applies (see Rule 803, 804, 807); Exhibit will be properly for breach of contract, CMIA, CIPA, invasion of privacy.  By Flo & Meta: Authenticity, Exception applies (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.  Proof rebutting Defendants'  Proof rebutting Defendants'  Proof rebutting Defendants'				8/ F									
Will present certified translation and/or translator as a witness.  Will present certified translation and/or translator as a witness.  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly for breach of contract, CMIA, outweighed authenticated (see Rule 901); Not subsequent remedial measures and/or exception applies (see Rule 407); Balance favors of the present lamps admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The proof rebutting Defendants'  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); Exhibit will be properly for breach of contract, CMIA, admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.  Proof rebutting Defendants'  Proof of Defendants' liability for breach of contract, CMIA, admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.												Evidence	Balance favors admissibility (see Rules 401, 403).
Will present certified translation and/or translator as a witness.  Will present certified translation and/or translator as a witness.  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Exhibit will be properly for breach of contract, CMIA, outweighed authenticated (see Rule 901); Not subsequent remedial measures and/or exception applies (see Rule 407); Balance favors of the present lamps admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The proof rebutting Defendants'  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); Exhibit will be properly for breach of contract, CMIA, admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.  Proof rebutting Defendants'  Proof of Defendants' liability for breach of contract, CMIA, admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The exhibit is relevant (see Rules 401, 402); MIL is opposed.													Document is original or exception applies (see, e.g., Rule 1003, 1004, 1007)
META-FRASCO- 0000003368 through 0000003374  Metarsay, Probative Value Double of the contract o													
0000003368 through 0000003374 Secada, You Give Apps Sensitive Personal Information. Then Dournal (Feb. 22 2019 11:07 a.m. Authentication For breach of contract, CMIA, CIPA, invasion of privacy.  Authentication for breach of contract, CMIA, CIPA, invasion of privacy.  By Flo & Meta: Authenticity; Belavance; MIL; Personal (Feb. 22 2019 11:07 a.m.)  Proof rebutting Defendants'  Authentication for breach of contract, CMIA, CIPA, invasion of privacy.  By Flo & Meta: Authenticity; Evaluation (Feb. 22 2019 11:07 a.m.)  Proof rebutting Defendants'  Proof rebutting Defendants'	0128	META-FRASCO-	2/22/2019	Sam Schechner and Mark	n/a	Meta Custodian for	Proof of Defendants' liability					Hearsay, Probative Value	•
They Tell Facebook, Wall Street Journal (Feb. 22 2019 11:07 a.m.  By Flo & Meta: Authenticity; exhibit is relevant (see Rules 401, 402); MIL is opposed.  Proof rebutting Defendants'		0000003368 through											authenticated (see Rule 901); Not subsequent remedial measures and/or exception applies (see Rule 407); Balance favors
Journal (Feb. 22 2019 11:07 a.m. Proof rebutting Defendants' Relevance; MIL; Personal		0000003374					CIPA, invasion of privacy.					D. El. O.M. A. d. of S	admissibility (see Rules 401, 403); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); The
							Proof rebutting Defendants!						exhibit is relevant (see Rules 401, 402); MIL is opposed.
ET) affirmative defenses Knowledge					-								

Filing	g Starting Bates No.	Document Date	<b>Document Description</b>	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0129	FLO-00003058 through 00003062	3/29/2019	Flo's Second response letter to Acting Superintendent of Financial Services Linda A.		Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of				Relevance, Probative Value Outweighed, Hearsay, Personal Knowledge; MIL	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
			Lacewell re: Flo's sharing of information with Facebook			Google's and Meta's liability for CIPA; rebutting affirmative defenses.				By Google: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						derenses.					Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											MIL is opposed.
											Exhibit will be properly authenticated (see Rule 901).
0130	n/a	5/9/2023	Flo App Analysis Report of S. Egelman, Ph.D.	Confidential	Serge Egelman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping,  Expert Cross-Examination		Hearsay; MIL; Improper Expert Opinion; Inadmissible Expert Report; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.  Proper expert opinion/report. See ECF No. 597.  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0131	n/a	6/27/2023	Expert Rebuttal Report of S. Egelman, Ph.D.	n/a	Serge Egelman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.	S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping -		Hearsay; MIL; Improper Expert Opinion; Inadmissible Expert Report	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.  Proper expert opinion/report. See ECF No. 597.
0132	n/a	2/12/2021	Class Action Complaint	n/a	Sarah Wellman	Rebutting Defendants' affirmative defenses.	Plaintiffs	Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness		MIL; Personal Knowledge; Hearsay	
						anirmative defenses.		Standing, Reievant to Witness Credibility, Cross-Examination of the Named Plaintiffs			Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0133		10/20/2022	Plaintiff Sarah Wellman's	Confidential	Sarah Wellman	Proof of Flo's liability for	S. Wellman	Relevant to defending Plaintiffs' CIPA -		Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Amended Objections and Responses to Defendants' First Set of Interrogatories to Plaintiff Sarah Wellman			breach of contract, CMIA, and invasion of privacy; proof of Google's and Meta's liability for CIPA.		632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel,		By Flo: Personal Knowledge; MIL; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  MIL is opposed.
			Salah Welihah			ioi cii A.		Cross-Examination of the Named Plaintiffs			Exhibit will be properly authenticated (see Rule 901).
0134		1/10/2023	Plaintiff Sarah Wellman's Amended Supplemental	Confidential	Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and	S. Wellman	Relevant to defending Plaintiffs' CIPA - 632 claim, Relevant to Waiver,		Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Responses and Objections to Defendant Flo Health, Inc.'s Interrogatories to Plaintiff Sarah			invasion of privacy; proof of Google's and Meta's liability for CIPA.		052 claim, Refevant to Walver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel,		By Flo: Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
			Wellman			IOI CIFA.		Conse-Examination of the Named Plaintiffs			Exhibit will be properly admenicated (see Kuie 901).
0135	FLO-WELLMAN- 0000450		Email from Flo to Sarah Wellman on July 2, 2021 titled "Important legal notice for users who used		Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of				Hearsay; MIL; Personal Knowledge; Relevance; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.
			the app between June 30, 2016, and February 23, 2019, regarding			Google's and Meta's liability for CIPA; rebutting affirmative				By Flo & Google: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			our recent settlement with the FTC."			defenses.				By Flo & Google. Addictionery	The exhibit is relevant (see Rules 401, 402).
											Balance favors admissibility (see Rules 401, 403).
											Exhibit will be properly authenticated (see Rule 901).
0136			Plaintiff Sarah Wellman's Responses and Objections to		Sarah Wellman	Proof of Flo's liability for breach of contract, CMIA, and	S. Wellman	Relevant to defending Plaintiffs' CIPA - 632 claim -		Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Defendant Google LLC's Interrogatories to Plaintiff Sarah Wellman			invasion of privacy; proof of Google's and Meta's liability for CIPA.				By Flo: Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0137	n/a		"Google Search Terms" (a list of		Sarah Wellman	IOI CIFA.				Relevance; MIL	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
			[73] search terms Plaintiff's counsel provided to Google)							By Flo: Probative Value Outweighed	The MIL is opposed.
										By Google: Personal Knowledge;	Balance favors admissibility (see Rules 401, 403).
										Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											rvot nearsay (see Kuie 601) and/or nearsay exception applies (see Kuies 805, 804, 807).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0138	GOOG-FLO-00019507	5/25/2018	Google Privacy Policy		Witness Google Custodian	Rebutting affirmative defenses.	S. Ganem	Relevant to defending Plaintiffs' CIPA	-		By Flo: Hearsay; Authenticity;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be poperly
	through GOOG-FLO- 00019534		(5/25/2018 Version)		for Authentication			632 claim			Personal Knowledge; Relevance	authenticated (see Rules 901); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit is relevant (see Rules 401, 402).
0139	GOOG-FLO-00019668 through GOOG-FLO- 00019698	2/4/2021	Privacy Policy, GOOGLE, LLC (effective February 4, 2021)		Google Custodian for Authentication	Rebutting affirmative defenses.	S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	-		By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be poperly authenticated (see Rule 901); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); exhibit is relevant (see Rules 401, 402).
0140	FLO-00066600	1/11/2023	"Welcome to Flo" Terms of Use	Confidential	Flo Custodian for	Proof of Flo's liability for	S. Schumacher; S.	To establish Flo's affirmative defense	-		Agreed	N/A
			and Privacy Policy Agreement Page		Authentication	breach of contract; to rebut affirmative defenses.	Wellman	and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's	-			
0141	n/a	6/22/2018	Flo Terms of Service, effective as of June 22, 2018	s Confidential	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract; to rebut	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to	-		Agreed	N/A
						affirmative defenses.	Witness	Authorization				
0142	META-FRASCO- 0000002715 through	4/19/2018	Facebook Data Policy, date of last revision April 19, 2018	Confidential	Meta Custodian for Authentication	To rebut affirmative defenses.	Plaintiffs; T. Wooldridge: G. Nebo	Relevant to Consent, Relevant to	-		By Flo: Hearsay; Authenticity; Personal Knowledge; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	META-FRASCO- 0000002724		astrevision reprii 19, 2010		rumentication		Perlman; B. Arroyo	Authorization			reisonal knowledge, kelevance	Exhibit will be properly authenticated (see Rule 901).
	000002724											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0143		10/20/2022	Plaintiff Tesh Gamino's Amende	d Confidential	Tesha Gamino	Proof of Flo's liability for	T. Gamino	Relevant to defending Plaintiffs' CIPA			Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0143		10/20/2022	Objections and Responses to	u Confidential	Tesna Gamino	breach of contract, CMIA, and	1. Gamino	632 claim, Relevant to Waiver,	-			
			Defendants' First Set of Interrogatories to Plaintiff Tesha			invasion of privacy; proof of Google and Meta's liability for		Relevant to Consent/Ratification, Relevant to Expectations of			By Flo: Relevance; Probative Value Outweighed; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402).
			Gamino Tesna			CIPA.		Confidentiality, Relevant to Estoppel, Cross-Examination of the Named			Authenticity	Balance favors admissibility (see Rules 401, 403).
								Plaintiffs				Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0144	n/a	2/3/2021	Complaint, Gamino v. Flo Health Inc.	n/a	Jennifer Chen	Rebutting Defendants' affirmative defenses.	T. Gamino	Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness	-		By Flo: Opinion Testimony;	Not improper opinion testimony (Rule 701).
			rieaun inc.			ammative defenses.		Credibility, Cross-Examination of the			Hearsay; Personal Knowledge; MII	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
								Named Plaintiffs			By Meta: Probative Value Outweighed; MIL; Hearsay;	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Personal Knowledge	Balance favors admissibility (see Rules 401, 403).
0145	n/a	9/2/2021	Consolidated Class Action	n/a	Sarah Wellman	Rebutting Defendants'	Plaintiffs	Relevant to Lack of Harm, Relevant to	_		By Flo: Opinion Testimony;	MIL is opposed.  Not improper opinion testimony (Rule 701).
0143	in a	7/2/2021	Complaint	154	Erica Frasco	affirmative defenses.	i miniiis	Standing, Relevant to Witness			Hearsay; Personal Knowledge; MII	
								Credibility, Cross-Examination of the Named Plaintiffs			By Meta: Probative Value	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											Outweighed; MIL; Hearsay; Personal Knowledge	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												MIL is opposed.
0146	GOOG-FLO-00019562 through GOOG-FLO-	8/29/2016	Privacy Policy, GOOGLE, LLC (last modified August 29, 2016)			Rebutting Defendants' affirmative defenses.					By Flo: Relevance; Probative Value Outweighed; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402).
	00019578		(mot mounted rangust 27, 2010)		To Tunioniculon	anniau ve delenses.					Hearsay; Authenticity	Balance favors admissibility (see Rules 401, 403).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												Exhibit will be properly authenticated (see Rule 901).
0147	META-FRASCO- 0000001118 through	11/7/2019	FTC Civil Investigative Demand to Meta [FTC File No. 1923133]			Rebutting Defendants' affirmative defenses; proof of					Relevance, Probative Value Outweighed, Hearsay, Personal	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO- 0000001140		issued on November 7, 2019		Representative	data deletion; proof of damages, including punitive.					Knowledge; MIL	Balance favors admissibility (see Rules 401, 403).
	0000001140					merading pulluve.					By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
											By Meta: Character	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												MIL is opposed.
												Exhibit will be properly authenticated (see Rule 901).
												Not improper character evidence (Rule 404) and/or exception applies (Rules 607, 608, 609)

Filing Order	Starting Bates No.	Document Dat	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0148	n/a	10/31/2022	Defendant Meta Platforms, Inc.'s		Anjali Dahiya	Proof of Flo's liability for					Hearsay; Relevance	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Supplemental Responses and Objections to Plaintiffs' First Set		Wei Lu Karan Shah	breach of contract, CMIA, and invasion of privacy; proof of					By Flo: Probative Value	Balance favors admissibility (see Rules 401, 403).
			of Interrogatories, dated October		Raran Shan	Meta's liability for CIPA.					Outweighed; Personal Knowledge;	
			31, 2022								Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0149	META-FRASCO-	5/21/2018	Facebook Business Tools Terms,	n/a		Rebutting Defendants'	Flo Witness; A.	Relevant to Consent, Relevant to	-			The exhibit is relevant (see Rules 401, 402).
	0000000672 through META-FRASCO-		effective May 21, 2018		Authentication	affirmative defenses.	Dahiya; T. Wooldridge; S.	License Defense, Relevant to Authorization			Outweighed; Personal Knowledge; Hearsay; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000000675						Satterfield; F. Leach;				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
							J. Onuchina					Balance favors admissibility (see Rules 401, 403).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Exhibit will be properly authenticated (see Rule 901).
0150	META-FRASCO- 0000006340 through	2/28/2019	E-mail from Caitlin O'Neill (US Public Policy) to Chris Herndon,	Confidential	Anjali Dahiya; Steve Satterfield;	Proof of Defendants' liability for breach of contract, CMIA,					Hearsay	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated
	META-FRASCO-		Steve Satterfield, Anjali Dahiya		Tobias Wooldridge						By Flo: Relevance; Probative Value	(see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
	0000006341		on February 28, 2019 re			D C L W D C L W					Outweighed; Personal Knowledge;	
			"ROUGH NOTES - E&C phone briefing"			Proof rebutting Defendants' affirmative defenses					Authenticity	
0151	META-FRASCO-	2/22/2019	E-mail to Karissa Bell (Senior	n/a	Nissa Anklesaria;	Proof of Defendants' liability					Hearsay; Personal Knowledge	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
	0000019653 through META-FRASCO-		Tech Reporter, Mashable) from Meta (Nissa Anklesaria) on		Tobias Wooldridge	for breach of contract, CMIA, CIPA, invasion of privacy.					Dy Flor Dolovonou Broketiva Valva	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
	0000019654		February 22, 2019 re comment on			CIFA, invasion of privacy.					Outweighed; Authenticity	(see Kille 901), The exhibit is relevant (see Killes 401, 402), Balance lavois admissionity (see Killes 401, 403).
			WSJ/Flo health?			Proof rebutting Defendants' affirmative defenses						
0152	META-FRASCO-	6/11/2020	Facebook Business, "Good	n/a	Meta Custodian for		T. Wooldridge; W.	Relevant to Absence of Eavesdropping	_		Relevance, Hearsay, Personal	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
0152	0000002226 through	0/11/2020	Questions and Real Answers:		Authentication;	for breach of contract, CMIA,	Liu; F. Leach; J.	reservant to rissence of Euresanopping			Knowledge; Probative Value	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated
	META-FRASCO- 0000002232		How does Facebook Use Machine Learning to Deliver		Tobias Wooldridge	CIPA, invasion of privacy.	Zheng; T. Frantsuzenko				Outweighed	(see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
	0000002232		Ads"			Proof rebutting Defendants'	riantsuzenko				By Flo: Authenticity	
						affirmative defenses						
0153	META-FRASCO- 0000019555 through	Unknown	"The Journey of an Ads Ranking Model" (Revision 721 03277)	HC-AEO	Meta Custodian for Authentication:	Proof of Defendants' liability for breach of contract, CMIA,					Relevance, Hearsay, Personal Knowledge; Probative Value	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated
	META-FRASCO-		model (revision /21 032//)			CIPA, invasion of privacy.					Outweighed	(see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
	0000019557					Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	
0154	META-FRASCO-	1/10/2020	Meta's Response to FTC's	HC-AEO	Meta Custodian for	Proof of Defendants' liability					Relevance, Probative Value	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
	0000001089 through		November 7, 2019 Civil		Authentication; FTC	for breach of contract, CMIA,					Outweighed, Personal Knowledge,	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated
	META-FRASCO- 0000001092		Investigative Demand, dated January 10, 2020		Representative; Tobias Wooldridge	CIPA, invasion of privacy.					Hearsay; MIL	(see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); MIL is opposed.
	000001072		Junuary 10, 2020		200 ma Wooda Tuge	Proof rebutting Defendants'					By Flo: Authenticity	improper character extense (see true 101) and of exception applies (see trues 001, 000, 007), WILL is opposed.
						affirmative defenses					D. Mater Character	
0155	META-FRASCO-	2/27/2019	Letter from NY DFS (Linda	Confidential	Meta Custodian for	Proof of Defendants' liability					By Meta: Character Relevance, Probative Value	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
	0000008101 through		Lacewell, Acting Superintendent		Authentication;	for breach of contract, CMIA,					Outweighed, Personal Knowledge,	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated
	META-FRASCO- 0000008103		of Financial Services) to Meta (Mark Zuckerberg, CEO and		NYSDFS Representative;	CIPA, invasion of privacy.					Hearsay; MIL	(see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Not improper character evidence (see Rule 404) and/or exception applies (see Rules 607, 608, 609); MIL is opposed.
	000000103		Chaiman, and Deborah Yee-Ky			Proof rebutting Defendants'					By Flo: Authenticity	improper character creative (see reactive) and of exception applies (see reactive), 500, 507), WILL is opposed.
			Liu, CEO) dated February 27,			affirmative defense					De Mater Charact	
0156	n/a	2/18/2021	2019 Report on Investigation of	n/a	NYSDFS	Proof of Flo's liability for					By Meta: Character Relevance, Probative Value	The exhibit is relevant (see Rules 401, 402).
			Facebook Inc. Data Privacy		Representative;	breach of contract, CMIA, and					Outweighed, Personal Knowledge,	, , ,
			Concerns, N.Y. STATE DEP'T OF FIN. SERVS. (Feb. 18, 2021)		Tobias Wooldridge	invasion of privacy; proof of Meta's liability for CIPA;					Hearsay; MIL	Balance favors admissibility (see Rules 401, 403).
			OT THY. SERVO. (FOD. 10, 2021)			rebutting affirmative defenses.					By Flo: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											By Meta: Character	MIL is opposed.
												Exhibit will be properly authenticated (see Rule 901).
												Not improper character evidence (Rule 404) and/or
												exception applies (Rules 607, 608, 609)

Filing	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
0157	META-FRASCO- 0000022416 through	8/26/2020	Meta Workplace post "% of web signals from prohibited sources"	HC-AEO	Michelle Chen; Tobias Woolridge	Proof of Defendants' liability for breach of contract, CMIA,					Relevance, Probative Value Outweighed, Personal Knowledge,	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated
	META-FRASCO- 0000022419		(Metric Update by Michelle Chen on August 26, 2020)		Tobias woolinge	CIPA, invasion of privacy.					Hearsay	roundation personal informage with ore established (see Rules 201, 002, 901, 902), Exhibit with or properly admenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403); Not subsequent remedial measures and/or exception applies (see Rule 407).
	0000022419		on rugust 20, 2020)			Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	subsequent tenedial measures and of exception appries (see true 407).
											By Meta: Subsequent Remedial Measures	
0158	META-FRASCO-	2/28/2019	App Categorization, with Signals	HC-AEO	Wei Liu; Anh Bui	Proof of Defendants' liability					Hearsay, Personal Knowledge;	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
	0000024968 through META-FRASCO- 0000024980		Integrity applications in mind (last updated February 28, 2019 by Hong Chun Leung)			for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
	0000024980		by Hong Chun Leung)			Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	
0159	META-FRASCO-		Meta, Internal Quip "Signals	HC AEO	Nissa Anklesaria;	Proof of Defendants' liability	T. Wooldridge; A.	Relevant to Absence of Eavesdropping	-		Hearsay, Personal Knowledge;	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
	0000020292 through META-FRASCO- 0000020387	updated)	Primer"		Anh Bui	for breach of contract, CMIA, CIPA, invasion of privacy.	Dahiya; A. Bui; G. Nebol-Perlman				Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
						Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	
0160	META-FRASCO- 0000406172	2/27/2019	Internal messages between Anh	Confidential	Wei Liu; Anh Bui	Proof of Defendants' liability					Hearsay, Personal Knowledge;	Not hearsay or opinion testimony (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807);
	0000406172		Bui and Hong Chun Leung re App Categorization			for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); Exhibit will be properly authenticated (see Rule 901); The exhibit is relevant (see Rules 401, 402); Balance favors admissibility (see Rules 401, 403).
						Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	
	n/a	5/9/2023	Ph.D.	HC AEO	Georgios Zervas		G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0162	META-FRASCO-Zervas- 00000061 through META		Amazon, "Web Services titled Caching Overview"	n/a	Georgios Zervas		G. Zervas	Relevant to Absence of Eavesdropping	-		By Flo: Relevance; Probative Value Outweighed; Personal Knowledge;	
	FRASCO-Zervas- 00000066		Caching Overview								Hearsay; Authenticity	
0163	n/a	6/27/2023	Expert Rebuttal Report of G. Zervas, Ph.D.	HC AEO	Georgios Zervas		G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0164	GOOG-FLO-00019535 through GOOG-FLO-	12/18/2017	Google Privacy Policy (last modified December 18, 2017)		Google Custodian for Authentication	Rebutting Defendants' affirmative defenses.	L. Ridgway	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-			By Flo: Relevance; Probative Value Outweighed; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402); balance favors admissibilty (Rule 403); not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be poperly authenticated (see Rule 901);
	00019544							examination of the Named Plaintiffs			Hearsay; Authenticity	foundation/personal knowledge will be established (see Rules 201, 602, 901, 902)
0165	FLO-00000267	Undated	OwHealth, Inc. Terms of Service	Confidential	Flo Custodian for Authentication	Proof of Flo's liability for breach of contract, CMIA, and	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense	-		Agreed	
					Authentication	invasion of privacy; rebutting affirmative defense	witness	License Defense				
0166	n/a	10/20/2022	Plaintiff Autumn Meigs'		Autumn Meigs	Proof of Flo's liability for	A. Meigs	To establish Flo's affirmative defense			Hearsay; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Amended Objections and Responses to Defendants' (Meta			breach of contract, CMIA, and invasion of privacy; proof of		and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs			By Flo & Meta: Relevance;	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			Platforms, Inc., Google LLC, and			Meta and Google's liability for		oranimation of the Panica Panical			Probative Value Outweighed; MIL	
			Flurry, LLC) First Set Of Interrogatories			CIPA.					By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).
			interrogatories								By 110. Fullicitienty	Balance favors admissibility (see Rules 401, 403).
												MIL is opposed.
0167	n/a	10/24/2022	Plaintiff Autumn Meigs'		Autumn Meigs	Proof of Flo's liability for	A. Meigs	To establish Flo's affirmative defense			Hearsay	Exhibit will be properly authenticated (see Rule 901).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0167	n/a	10/24/2022	Verification of her (October 20,		Autumn Meigs	breach of contract, CMIA, and	A. Meigs	and rebut all of Plaintiff's claims; cross-			Hearsay	Not nearsay (see Kuie 801) and/or nearsay exception applies (see Kuies 803, 804, 807).
			2022) Amended Objections and Responses to Defendants' (Meta			invasion of privacy; proof of		examination of the Named Plaintiffs				Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			Platforms, Inc., Google LLC, and Flurry, LLC) First Set Of			Meta and Google's liability for CIPA.					Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).
			Interrogatories									Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0168	FLO-00000212	Unknown	Flo Welcome Screen								Agreed	
						breach of contract, CMIA, and	Karkanias; Named	Plaintiff's claims				
						CIPA.	- mains Experts					
0168	FLO-0000212	Unknown	Flo Welcome Screen		Flo Custodian for Authentication	invasion of privacy; proof of Meta and Google's liability for	Scrobov; C. Karkanias; Named Plainitffs; L. Lydon;	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			Agreed	Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0169		5/9/2023	Analysis Report for Flo App Analysis Report of S. Egelman	n/a	Serge Egelman	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.		Relevant to Absence of Eavesdropping	-		Hearsay; Authenticity; Relevance; MIL; Inadmissible Expert Report; Probative Value Outweighed; Personal Knowledge; Improper Expert Opinion	
0170	n/a	5/1/2022	Flo Terms of Use, effective May 1, 2022	n/a			Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		By Google: Relevance; Personal Knowledge; Hearsay; Authenticity By Meta: Relevance; Subsequent Remedial Measures	
0171	n/a	8/2/2023	AppCensus Terms of Service	n/a	Serge Egelman		S. Egelman	Relevant to Consent, Relevant to License Defense	-		By Flo & Google: Relevance; Personal Knowledge; Hearsay; Authenticity By Flo: Probative Value Outweighed	
0172	META-FRASCO- 0000028179	undated	Meta, "App Events Best Practice Guide"	n/a		Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses	T. Wooldridge, A. Dahiya; W. Liu; A. Lapitski	Relevant to Absence of Eavesdropping	-			Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0173	META-FRASCO- 0000406101 through META-FRASCO- 0000406102	3/29/2018	Internal Meta messages (Stan Wu, Christina Xu, Liang Xu, Wei Liu, Yujing Wang, Li Zhou, Bo Zhu) re "crawling sensitive user data in SDK" on March 29, 2018	Confidential	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					By Flo: Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0174	META-FRASCO- 0000406087	4/2/2018	Internal Meta Task by Christina Xu "Detect and filter sensitive user data in app_indexing endpoint"	Confidential	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay, Personal Knowledge By Flo: Relevance; Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0175	META-FRASCO- 0000026020 through META-FRASCO- 0000026022	4/8/2019	Kill-Switch Proposal (last edited by Zilin Zhang April 8, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly subparticated (see Rule 801).
0176	META-FRASCO- 0000006225 through META-FRASCO- 0000006226	3/27/2019	Internal Meta Task by Zilin Zhang re "[Privacy Control]Kill Switch" created on March 27, 2019	Confidential	Anh Bui; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed By Flo: Authenticity	Exhibit will be properly authenticated (see Rule 901).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0177	META-FRASCO- 0000023471 through META-FRASCO- 0000023546	3/12/2019	Advanced Matching for App (created on March 12, 2019)	НС-АЕО	Anjali Dahiya; Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay By Flo: Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0178	META-FRASCO-	12/19/2018	Internal Meta messages (various)	Confidential	Anjali Dahiya; Wei	Proof of Defendants' liability					Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000022596 through	through	RE: Advance notice of		Liu	for breach of contract, CMIA,					Probative Value Outweighed;	
	META-FRASCO-	3/13/2019	publication How Facebook			CIPA, invasion of privacy.					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	0000022616		Tracks Users of Android Apps (to									
			be published on December 29, 2018)			Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).
			2018)			affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0179	META-FRASCO- 0000023547 through	6/24/2019	(IDFA Ranking Model Resilience 2019 H1 Retro) Part 1 -	HC-AEO	Anjali Dahiya; Wei	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	META-FRASCO-		Overview, Impact, Challenges,		Liu	CIPA, invasion of privacy.					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	0000023604		Results, Limitations, and Future			cirri, irrasion or privacy.					By Flo: Probative Value	Total data of personal anomong common state (see rates 201, 002, 701, 702).
			Directions (created on June 24,			Proof rebutting Defendants'					Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).
			2019)			affirmative defenses						
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0180	META-FRASCO-	8/1/2019	S&I H2 2019 Roadmap for Post	HC-AEO	Wei Liu	Proof of Defendants' liability					Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000026256 through META-FRASCO-		(created on August 1, 2019)			for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	0000026277					CIFA, ilivasion of privacy.					By Flo: Probative Value	Foundation personal knowledge will be established (see Rules 201, 002, 901, 902).
	000020277					Proof rebutting Defendants'					Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).
						affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Balance lavois admissionity (see Rules 401, 405).
												Exhibit will be properly authenticated (see Rule 901).
0181	META-FRASCO-	7/9/2019	(2019 H1) Christina Xu (Draft)	HC-AEO	Wei Liu	Proof of Defendants' liability					Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000025115 through META-FRASCO-		re logging issue in Meta SDK that violates GDPR and user			for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	0000025147		privacy (created on July 9, 2019)			Cit 11, invasion of privacy.					By Flo: Probative Value	Touridation personal knowledge will be established (see Rules 201, 002, 701, 702).
			, , , , , , , , , , , , , , , , , , ,			Proof rebutting Defendants'					Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).
						affirmative defenses						
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0182	META-FRASCO-	6/27/2018	Wei H1 2018 Project: Ship	HC-AEO	Wei Liu	Proof of Defendants' liability					Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000025572 through META-FRASCO-		Codeless App Event set up (created on June 27, 2018)			for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	0000025582		(created oil Julie 27, 2018)			CIFA, ilivasion of privacy.					By Flo: Probative Value	Foundation personal knowledge will be established (see Rules 201, 002, 901, 902).
						Proof rebutting Defendants'					Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).
						affirmative defenses						
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0183	META-FRASCO-	5/11/2019	(Draft) Vision for Private and	HC-AEO	Wei Liu	Proof of Defendants' liability	1				Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000025669 through		Intelligent Facebook SDK			for breach of contract, CMIA,					Hearsay	From 144 in (control 1 to 2011 to 2011 to 2011 (02 001 002)
	META-FRASCO- 0000025675		(created on May 11, 2019)	1		CIPA, invasion of privacy.					By Flo: Probative Value	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	0000025075					Proof rebutting Defendants'					Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).
						affirmative defenses						D. L. C L. ' 1111' ( D. L. 401, 402)
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0184	META-FRASCO-	8/31/2017	App Events Adoption and Quality		Wei Liu	Proof of Defendants' liability					Relevance; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000025649 through META-FRASCO-		<ul> <li>SE Pillar (created on August 31, 2017)</li> </ul>			for breach of contract, CMIA,					Hearsay	Foundation/governal Impulados will be established (see Bules 201, 602, 001, 002)
	0000025664		2017)			CIPA, invasion of privacy.					By Flo: Probative Value	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						Proof rebutting Defendants'					Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).
						affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0185	META-FRASCO- 0000025703 through META-FRASCO- 0000025705	7/24/2019	Handle Project Pause Properly (created on July 24, 2019)	HC-AEO	Wei Liu	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay; Probative Value Outweighed By Flo: Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0186		9/10/2024	Jennifer Golbeck PhD Appendix A, CV		Jennifer Goldbeck	Proof of expert's qualifications; part of expert's report and thus proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.	J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo & Meta: Hearsay; Persona Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0187	n/a	6/28/2024	Rebuttal Expert Report of Jennifer Golbeck, dated Ph.D., June 28, 2024		Jennifer Goldbeck	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA.					Hearsay; Inadmissible Expert Opinion By Flo: Personal Knowledge; MIL	Proper expert opinion/report. See ECF No. 597  MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0188	n/a	2/28/2019	Internal Google emails (Satvik Chauhan, David Schachter, Ben Solis-Cohen) re "SDK + UAC Commercialization: App Sensitive Categories (February 28, 2019 to March 7, 2019)		Ben Ewing	Proof of Flo's liability for breach of contract, CMIA, and invasion of privacy; proof of Meta and Google's liability for CIPA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0189	META-FRASCO- 0000003276 through META-FRASCO- 0000003278	2/22/2019	Wall Street Journal Article titled "Cuomo Calls for Probe Into Facebook's Collection of Sensitive Data from Apps"	n/a	Meta Custodian for Authentication	Proof rebutting Defendants' affirmative defenses					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed; MIL By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0190	META-FRASCO- 0000023433 through META-FRASCO- 0000023444	4/4/2019	Quip referencing Bates -438	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay; Probative Value Outweighed By Flo: MIL; Personal Knowledge Authenticity	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0191	META-FRASCO- 0000022627 through META-FRASCO- 0000022628	3/5/2019	Internal Meta message (Steve Satterfiled, Anjali Dahiya, Andrew Howard) Re: Proposed Data Definitions	Confidential	Anjali Dahiya; Steve Satterfield; Andrew Howard	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy. Proof rebutting Defendants' affirmative defenses					Hearsay  By Flo: MIL; Relevance; Probativ Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.

Filing	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Orde	Starting Bates No.	Document Date	Document Description	Designation	Sponsoring Witness	Traintins Exhibit I ut pose	Sponsoring Witness	Detendants Exhibit I ut pose	Taments Objections	Detendants Response	Detenuants Objections	Hamuns response
0192	META-FRASCO- 0000008287 through META-FRASCO-	11/6/2020	Letter dated November 6, 2020 and titled "The Department of Financial Services' October 22,	Confidential	Meta Custodian for Authentication; NYSDFS	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance; Personal Knowledge; Hearsay; Probative Value Outweighed; MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000008294		2020 Telephone Conference with Facebook, Inc. re: Business Tools		Representative; Anjali Dahiya	Proof rebutting Defendants'					By Flo: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			Investigation"			affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0193	0000023605 through	3/29/2019	Quip showing Bates - 610	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Hearsay; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO- 0000023614					CIPA, invasion of privacy.					By Flo: MIL; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defenses					Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0194	META-FRASCO-	2/26/2019	E-mails dated February 26, 2019	Confidential	Anjali Dahiya;	Proof of Defendants' liability					Probative Value Outweighed;	The exhibit is relevant (see Rules 401, 402).
	0000022554 through META-FRASCO-		re "PSI Briefing Request"		Steve Satterfield	for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000022556					Proof rebutting Defendants'					By Flo: MIL; Relevance; Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0195	META-FRASCO- 0000030001		E-mails re: "WSJ reporting on app sharing"	Confidential	Steve Satterfield; Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Probative Value Outweighed; Hearsay; MIL	The exhibit is relevant (see Rules 401, 402).
						CIPA, invasion of privacy.					By Flo: Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defenses					Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
												Exmon will be properly aumenicated (see Rule 901).  MIL is opposed.
0196	META-FRASCO-	2/1/2019	Chat from Dahiya to Ron	Confidential	Anjali Dahiya;	Proof of Defendants' liability					Hearsay	The exhibit is relevant (see Rules 401, 402).
	0000023131		Sherman, Steve Satterfield, and Brad Weltman		Steve Satterfield; Brad Weltman	for breach of contract, CMIA, CIPA, invasion of privacy.						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants'					Value Outweighed; Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0197		2/27/2019	Internal Facebook chat	Confidential	Anjali Dahiya;	Proof of Defendants' liability					Hearsay	The exhibit is relevant (see Rules 401, 402).
	0000006336 through META-FRASCO- 0000006337				Steve Satterfield	for breach of contract, CMIA, CIPA, invasion of privacy.						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	000000055/					Proof rebutting Defendants' affirmative defenses					Value Outweighed; Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						annuality delenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.

Filing Order	Starting Bates No.	Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0198	META-FRASCO- 0000006284 through	3/5/2019	Internal emails re: "FPF's take or WSJ article on health	n Confidential	Mitness Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Hearsay	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO- 0000006286		data/SDKs"		Sieve Satterneid	CIPA, invasion of privacy.					By Flo: MIL; Probative Value Outweighed; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defense					Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0400	A COMP. TO LOGO	2/5/2010		0 71 11								MIL is opposed.
0199	META-FRASCO- 0000022647	3/5/2019	E-mail from Dahiya to Steve Satterfield about a question I	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
			received from the Messenger the Facebook Messenger team.			CIPA, invasion of privacy.					By Flo: MIL; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defense					Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0200	META-FRASCO- 0000022694 through	2/12/2019	Email from Shirine Sajjadi to Anjali Dahiya re: "ACTION	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO- 0000022702		REQUIRED: TEST APPROVAL"			CIPA, invasion of privacy.					By Flo: Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defense					Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0201	META-FRASCO- 0000006238	4/10/2019	Chat between Anjali Dahiya, Abbas Ravjani, et. al. re: WSJ	n/a	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
			article.			CIPA, invasion of privacy.					By Flo: Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defenses					Authenticity; MIL	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0202	META-FRASCO- 0000006354	4/15/2019	Chat between Yura Kostiukech, Anjali Dahiya, et. al. re: data	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
			handling			CIPA, invasion of privacy.					By Flo: Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defenses					Authenticity; MIL	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0203	META-FRASCO- 0000020787 through	3/12/2019	MDP Advanced Matching for App conversation history (Bates	HC AEO	Nissa Anklesaria; Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Personal Knowledge; Probative Value Outweighed;	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO- 0000020862		number ended in -826)			CIPA, invasion of privacy.					Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defenses					By Flo: Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).

*****	G	In	n .n .i.		701 1 1001	DI 1 100 1 D 1 D 1 D		D. A. L. LIDLING	D1 1 100 1 01 1 1	n		
Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0204	META-FRASCO-	2/20/2019	Internal messages between Anjali	Confidential	Anjali Dahiya;	Proof of Defendants' liability					Probative Value Outweighed;	The exhibit is relevant (see Rules 401, 402).
	0000022617 through META-FRASCO-		Dahiya and Steve Satterfield re: WSJ article and "hashed PII"		Steve Satterfield	for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000022619					Proof rebutting Defendants'					By Flo: MIL; Relevance; Personal Knowledge; Authenticity	
						affirmative defenses					Knowledge, Addictions	
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0205	META-FRASCO- 0000022963 through	2/26/2019	Emails re "PSI Briefing Request" (Myriah Jordan, Steve Stterfield,	Confidential	Anjali Dahiya; Steve Satterfield	Proof of Defendants' liability for breach of contract, CMIA.					Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO-		Erin Egan, Brian Rice, Kevin		Sieve Suiterneid	CIPA, invasion of privacy.						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000022966		Martin, Grer Maurer)			Proof rebutting Defendants'					By Flo: MIL; Relevance; Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0206	META EDIAGO	2/1/2010	T	0.51.61	1	D. C.CD.C. L. (17.17)					D.I. II	MIL is opposed.
0206	META-FRASCO- 0000023049	3/1/2019	Internal messages re PSI's hearing re WSJ's article	Confidential	Anjali Dahiya	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Hearsay	The exhibit is relevant (see Rules 401, 402).
						CIPA, invasion of privacy.					By Flo: MIL; Relevance; Personal Knowledge; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants'					,	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses						Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.
0207		4/19/2019	E-mail from Toby Roessingh to	Confidential	Anjali Dahiya	Proof of Defendants' liability					Relevance; Probative Value	The exhibit is relevant (see Rules 401, 402).
	0000023214 through META-FRASCO-		Alexander Brasil, et. al. re: "Order ID for FS"			for breach of contract, CMIA, CIPA, invasion of privacy.					Outweighed; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000023217					Proof rebutting Defendants'					By Flo: Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses						
												Balance favors admissibility (see Rules 401, 403).
0208	META-FRASCO-	9/5/2018	Internal document titled [MDP]	HC AEO	Anjali Dahiya	Proof of Defendants' liability					Relevance; Probative Value	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0208	0000023392 through	9/3/2016	Conversion Health	IIC-ALO	Anjan Daniya	for breach of contract, CMIA,					Outweighed; Hearsay	
	META-FRASCO- 0000023432					CIPA, invasion of privacy.					By Flo: Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						Proof rebutting Defendants' affirmative defenses					Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						annuative detenses						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0209	META-FRASCO- 0000028491 through	5/1/2019	Meta Signals FYI Chat	HC AEO	Meta Custodian for Authenticity	Proof of Defendants' liability for breach of contract, CMIA,	A. Dahiya; G. Nebol- Perlman; V.	Relevant to Absence of Eavesdroppin	g -		Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
	META-FRASCO-				Authenticity	CIPA, invasion of privacy.	Sergiienko					Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
	0000028492					Proof rebutting Defendants'					By Flo: Personal Knowledge; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses						Balance favors admissibility (see Rules 401, 403).
0210	GOOG-FLO-00081653-	5/28/2019	Email chain dated 5/28/19 re: [5-	HC-AEO	Evgenia	Proof of Flo's liability for					Relevance; Hearsay; Personal	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803,
	656		310000026659] Ads are		Olerinskaya; Maria	violation of CMIA, breach of					Knowledge	804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility
			Disproved / Approved (Limited) / Eligible (Case 5-		Volchenok	contract, and invasion of privacy; proof of Google's					By Flo: Probative Value	(see Rules 401, 403); exhibit will be properly authenticated (see Rule 901)
			3100000026659)			liability for breach of CMIA; proof of damages, including					Outweighed; Authenticity	
					1	nunitive.						

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0211	GOOG-FLO-00082935- 937	9/27/2019	Email chain dated 9/27/19 re: [3 6269000028073] Ad Review  8072325127	- Confidential	Evgenia Olerinskaya; Maria Volchenok	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see Rule 901)
0212	GOOG-FLO-00082943	9/30/2019	Email dated 9/30/19 re: [3-62690000028073] Ad Review  8072325127	HC-AEO	Evgenia Olerinskaya; Maria Volchenok	Proof of Flo's liability for					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see Rule 901)
0213	GOOG-FLO-00082931- 932	9/27/2019	Email dated 9/27/19 Re: [3-6269000028073] Ad Review  8072325127	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see Rule 901)
0214	GOOG-FLO-00081701- 703	5/30/2019	Email chain dated 5/30/19 Re: [: 3100000026659] Ads are Disapproved / Approved (Limited) / Eligible (Case 5- 3100000026659)	5- HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for violation of CMIA, breach of contract, and invasion of privacy; proof of Google's liability for breach of CMIA; proof of damages, including punitive.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); balance favors admissibility (see Rules 401, 403); exhibit will be properly authenticated (see Rule 901)
0215	n/a	2/27/2019	Memorandum of Decision & Order, Paul Jensen v. Cablevisio Systems Corporation	n/a n			J. Golbeck	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	-		By Flo: Relevance; Probative Valu Outweighed; Personal Knowledge; Hearsay; Authenticity	
0216		12/3/2013	Court Order, Rembrandt Social Media v. Facebook				J. Golbeck	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	-		By Flo: Relevance; Probative Valu Outweighed; Personal Knowledge; Hearsay; Authenticity	
0217	Flohealth_Golbeck_0000 010-015	0 8/4/2022	Engagement Agreement betweer United Expert Holdings, LLC, J. Golbeck, and Labaton Sucharow				J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Bias	-		By Flo: Relevance; Probative Valu Outweighed; Personal Knowledge; Hearsay; Authenticity	
0218		9/11/2019	Flo website post "Flo Is the #1 Health and Fitness App by Downloads Worldwide in the App Store" https://flo.health/newsroom/most installed-app	-	Flo Custodian for Authentication	Proof of Flo's liability for violation of CMIA.					Relevance; Hearsay; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0219		n/a	"Medical accuracy and expertise Why you can trust Flo" https://flo.health/medical- expertise	:	Flo Custodian for Authentication	Proof of Flo's liability for violation of CMIA.					Relevance; Hearsay; Probative Value Outweighed; Personal Knowledge; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0220		n/a	About Us, FLO HEALTH, INC. https://flo.health/our-mission (lavisited Sept. 1, 2021)		Flo Custodian for Authentication	https://flo.health/our-mission					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).

Joint Preliminary Trial Exhibit List
Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0221	n/a	2/24/2019	Sam Schechner, Popular Apps Cease Sharing Data With Facebook, Wall Street Journal, available at https://www.wsj.com/articles/pop	n/a	Susan Schumacher Roman Bugaev Flo Custodian for Authentication	Rebut affirmative defenses; background/context; effect on Defendants.	S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen			Personal Knowledge; Probative Value Outweighed; Hearsay; Authenticity; Relevance By Flo: MIL	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			ular-apps-cease-sharing-data- with-facebook-11551044791								By Tro. MILE	Exhibit will be properly authenticated (see Rule 901).
0222		1/13/2021	Developer of Popular Women's Fertility-Tracking App Settles FTC Allegations that It Mislead		FTC Representative	Rebut affirmative defenses.					Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay; MIL	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			Consumers About the Disclosure of their Health Data, FTC (Jan. 13, 2021)								By Flo: Authenticity	Balance favors admissibility (see Rules 401, 403).
			https://www.ftc.gov/news- events/press- releases/2021/01/developer- popular-womens-fertility-tracking-									Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  MIL is opposed.
			app-settles-ftc									Exhibit will be properly authenticated (see Rule 901).
0223	PL001007	2/5/2020	Terms of Use, FLO HEALTH, INC. (effective Feb. 5, 2020) https://flo.health/terms-of-service		Flo Custodian for Authentication		J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs			By Google & Meta: Relevance	
0224			Google Analytics Terms of		Google Custodian					because of Plaintiffs' pursuit of punitive damages	By Flo: Hearsay; Authenticity;	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807). Exhibit will be properly
0224		9/1/2021	Service		for Authentication	Proof of Flo's liability for					Relevance; Probative Value Outweighed; Personal Knowledge	authenticated (see Rule 901). The exhibit is relevant (see Rules 401, 402). Balance favors admissibility (see Rules 401,
0225		9/1/2021	This is AppsFlyer, APPSFLYER, INC. https://www.appsflyer.com/we-		AppsFlyer Custodian for Authentication	breach of contract, violation of the CMIA, and invasion of	,				Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			are-appsflyer/ (last visited Sept. 1, 2021)			privacy.						Balance favors admissibility (see Rules 401, 403).
												Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
0226	n/a	1/28/2020	Donna Rosato, What Your Period Tracker App Knows About You, Consumer Reports, available at https://www.yahoo.com/news/per iod-tracker-app-knows- 110002532.html				S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen	t		Relevance; Personal Knowledge; Probative Value Outweighed; Hearsay; Authenticity	
0227		1/13/2021	FTC Settlement			Rebutting Defendants'					Relevance; Probative Value	The exhibit is relevant (see Rules 401, 402).
					Flo Custodian for Authentication	affirmative defenses; proof of damages, including punitive					Outweighed; Hearsay; Personal Knowledge; Authenticity; MIL	Balance favors admissibility (see Rules 401, 403).
												Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
												MIL is opposed.

Starting Bates No. Document Date Order Ord	
FTC Decision & Order  FTC Peresentative; Rebutting Defendants' FTC Decision & Order  FTC Peresentative; Rebutting Defendants' FTC Decision & Order  MIL: Relevance; Probative Value Outweighed; Hearsay; Personal Knowledge; Authenticity  The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule	
Authentication damages, including punitive Knowledge; Authenticity The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule	
Balance favors admissibility (see Rules 401, 403).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule	
Foundation/personal knowledge will be established (see Rules 201, 60	(02 004 002)
	, 602, 901, 902).
Exhibit will be properly authenticated (see Rule 901).	
Emilia will be properly distinguished (see rate 551).	
0229 7/5/2021- Notice to Flo App users Flo Custodian for Proof of Flo's liability for Probative Value Outweighed; MIL is opposed.	
7/6/2021 Authentication violation of the CMIA, breach of contract, and invasion of the CMIA and invasion of the CMIA, breach of contract, and the CMIA, breach	
of contract, and mission of privacy: Proof of Meta and	
Google's liability for violation of CIPA; rebut affirmative	
defenses.  Not hearsay (see Rule 801) and/or hearsay exception applies (see Ru	Rules 803, 804, 807).
Foundation/personal knowledge will be established (see Rules 201, 60	, 602, 901, 902).
Exhibit will be properly authenticated (see Rule 901).	
9/27/2019 Flo Health, Inc. Statement of Information, SEC'Y OF STATE Flo Custodian for Authentication Flo Custodian for Hearsay, Authenticity; Probative Florest Flor	
OF THE STATE OF CAL. (Sept. 27, 2019),  Value Outweighed Balance favors admissibility (see Rules 401, 403).	
Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 801) Document/RetrievePDF?ld=0431	Rules 803, 804, 807).
Foundation/personal knowledge will be established (see Rules 201, 60	, 602, 901, 902).
Exhibit will be properly authenticated (see Rule 901).	
0231 n/a 3/2/2021 Class Action Complaint, Chen v. Flo Health Flo Health Flo Health Rebutting affirmative defenses. J. Chen Relevant to Lack of Harm, Relevant to - Standing, Relevant to Witness	
Credibility, Cross-Examination of the By Flo & Meta: Hearsay; Personal Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule	Rules 803, 804, 807).
Named Plaintiffs  Knowledge; Relevance; Probative  Value Outweighed  Foundation/personal knowledge will be established (see Rules 201, 60	, 602, 901, 902).
The exhibit is relevant (see Rules 401, 402).	
Balance favors admissibility (see Rules 401, 403).	
0232 3/1/2017 Google Privacy Policy (3/1/2017) S. Ganem Relevant to defending Plaintiffs' CIPA - By Flo: Hearsay; Authenticity;	
632 claim, Relevance; Probative Value Outweighed; personal knowledge /	
Personal Knowledge	
1/9/2023 Plaintiff Jennifer Chen's Belevant to defending Plaintiffs' CIPA - Hearsay; Personal Knowledge; Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 802) and/or hearsay exception applies (see Rule 803) and/or hearsay exception applies (see Rule 804) and/or hearsay exception applies (see Rule 804) and/or hearsay exception applies (see Rule 805) and/or hearsay exception applies (see Rule 806) and/or hearsay exception applies (see Rule	Rules 803, 804, 807).
Responses and Objections to violation of the CMIA, breach of contract, and invasion of Pedendant Google LLC's of contract, and invasion of Relevant to Consent/Ratification,	, 602, 901, 902).
Interrogatories privacy; Proof of Meta and Relevant to Expectations of By Flo: Authenticity; Probative	,, ,
Google's liability for violation of CIPA; rebut affirmative Cross-Examination of the Named  Confidentiality, Relevant to Estoppel, Value Outweighed The exhibit is relevant (see Rules 401, 402).	
defenses.  Closs-Examination of the Named  Balance favors admissibility (see Rules 401, 403).	
Exhibit will be properly authenticated (see Rule 901).	
1/20/2023 Verification of Interogatory Jennifer Chen Proof of Flo's liability for J. Chen Relevant to defending Plaintiffs' CIPA - Hearsay; Personal Knowledge; Not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 801) and/or hearsay exception applies (see Rule 802) and/or hearsay (see Rule 803) and hearsay (see Rul	Rules 803, 804, 807).
Responses dated 1/9/2023 violation of the CMIA, breach of contract, and invasion of Relevant to Consent/Ratification,  Relevant to Consent/Ratification,  Relevant to Consent/Ratification,  Foundation/personal knowledge will be established (see Rules 201, 60	. 602, 901, 902).
privacy; Proof of Meta and Relevant to Expectations of By Flo: Authenticity; Probative	, , <del>, , .</del>
Google's liability for violation Confidentiality, Relevant to Estoppel,  Confidentiality, Relevant to Estoppel,  Value Outweighed The exhibit is relevant (see Rules 401, 402).	
of CIPA; rebut affirmative defenses.  Cross-Examination of the Named Plaintiffs  Balance favors admissibility (see Rules 401, 403).	
Exhibit will be properly authenticated (see Rule 901).	

Filing Order	Starting Bates No.	Document Date	<b>Document Description</b>	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections Defendants' Respons	se Defendants' Objections	Plaintiffs' Response
0235	FLO-00000001	7/17/2019	Flo Privacy Policy, effective as of July 17, 2019	Confidential	Flo Custodian for Authentication	Proof of damages claims; Proof rebutting affirmative defenses		Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-	Relevance; Personal Knowledge; Subsequent Remedial Measures	Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).
										By Flo: Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0236	FLO-00000289	8/19/2019	Flo Statement on Data Privacy			Proof of Flo's liability for				Personal Knowledge; Relevance;	Not subsequent remedial measures and/or exception applies (see Rule 407).  Balance favors admissibility (see Rules 401, 403).
			(February 23, 2019)		Authentication	CMIA, intrusion upon seclusion, and breach of				Probative Value Outweighed; Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).
						contract claims; proof of damages claims; proof rebutting affirmative defenses					Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	TV 0 00000000	0.14.0.19.04.0	T		71.0	n					Not subsequent remedial measures and/or exception applies (see Rule 407).
0237	FLO-00000361	9/18/2019	List of user complaints Flo received		Flo Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA,				Probative Value Outweighed; Personal Knowledge; Hearsay	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						CIPA, invasion of privacy;					Balance favors admissibility (see Rules 401, 403).
						proof of damages				By Flo: Relevance	The exhibit is relevant (see Rules 401, 402).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0238	FLO-00001882	9/18/2019	September 9, 2019 email chain re: "Facebook Business Partner		Flo Custodian for Authentication	Proof of Defendants' liability for breach of contract, CMIA,				Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
			Data Requests #79414567607924"			CIPA, invasion of privacy				By Flo & Meta: Hearsay; Relevance; Probative Value	Balance favors admissibility (see Rules 401, 403).
										Outweighed	The exhibit is relevant (see Rules 401, 402).
0239	FLO-00001907	2/15/2010	Letter to NYSDFS re " February		Flo Custodian for	Proof of Defendants' liability				D.L. D.L.: W.L.	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0239	FLO-00001907		27, 2019 Letter to Flo Health,		Authentication;	for breach of contract, CMIA,				Relevance; Probative Value Outweighed; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
			Inc."		NYSDFS Representative	CIPA, invasion of privacy; proof rebutting affirmative				Hearsay; MIL	Balance favors admissibility (see Rules 401, 403).
					Representative	defenses				By Flo: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).
										The state of the s	Not subsequent remedial measures and/or exception applies (see Rule 407).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0240	FLO-00001911	7/10/2010	2010 07 10 ETC CID D		FL C + F C	Proof of Defendants' liability				D.L. C. W.L.	The MIL is oppsed.
0240	FLO-00001911	7/18/2019	2019.07.18 FTC CID Responses Letter			for breach of contract, CMIA,				Relevance; Probative Value Outweighed; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						CIPA, invasion of privacy; proof rebutting affirmative				Hearsay; MIL	Balance favors admissibility (see Rules 401, 403).
						defenses				By Flo: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).
										Tradition of the second of the	Not subsequent remedial measures and/or exception applies (see Rule 407).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
	TT 0 00000000	4.4.10000	44540 TH 01 1 1		71.0	n					The MIL is oppsed.
0241	FLO-00003099	1/1/2000	3-15-19 - Flo Submission - CONFIDENTIAL.PDF		Flo Custodian for Authentication;	Proof of Defendants' liability for breach of contract, CMIA,				Relevance; Probative Value Outweighed; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					NYSDFS Representative	CIPA, invasion of privacy; proof rebutting affirmative				Hearsay	Balance favors admissibility (see Rules 401, 403).
						defenses				By Flo: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).
											Not subsequent remedial measures and/or exception applies (see Rule 407).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0242	FLO-00003368	8/9/2022	Flo's Response to the FTC Settlement.mht		Authentication;	Proof of Defendants' liability for breach of contract, CMIA,				Relevance; Probative Value Outweighed; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					NYSDFS Representative	CIPA, invasion of privacy; proof rebutting affirmative				Hearsay; MIL	Balance favors admissibility (see Rules 401, 403).
						defenses				By Flo: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).
											Not subsequent remedial measures and/or exception applies (see Rule 407).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
					1						The MIL is opposed.

Filing Order	Starting Bates No.	Document Da	nte Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0243	META-FRASCO- 0000023832		Governor Guomo of New York announces end to investigat 1c u1erRdMPFwz99t	Confidential	Anjali Dahiya	Rebutting affirmative defenses.					Relevance; Probative Value Outweighed; Personal Knowledge; Hearsay; MIL	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
			3hyEJP35hXsvx_GtvdBPP8CEC iE.docx								By Flo: Subsequent Remedial	Balance tavors admissibility (see Rules 401, 405).  The exhibit is relevant (see Rules 401, 402).
											Measures	Not subsequent remedial measures and/or exception applies (see Rule 407).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												The MIL is opposed.
0244	FLO-00000359		Organizational chart		Flo Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of					Hearsay; Relevance; Probative Value Outweighed; Authenticity; Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
						contract claims.						The exhibit is relevant (see Rules 401, 402).
												Exhibit will be properly authenticated (see Rule 901).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0245	GOOG-FLO-00056047	9/13/2018	-ACM Graveyard- 1P SDK strategy for Apps _1ZzocAfzzEpFgf2JDD653PabZ vVgVdUajCQvQJd2X4jA.pptx	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of contract, and invasion of privacy.					Relevance; Personal Knowledge; Hearsay; Authenticity; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0246	GOOG-FLO-00057249	8/16/2018	"Baseview Data analysis" – excel spreadsheet of events		Kevin Lam Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of					Relevance; Personal Knowledge; Hearsay	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract, and invasion of privacy.					By Flo: Probative Value Outweighed; Authenticity	
0247	GOOG-FLO-00057699	6/26/2018	Document titled "Realigning our Measurement Strategy: 2018- 2019"	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of					Relevance; Personal Knowledge; Hearsay	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract, and invasion of privacy.					By Flo & Meta: Probative Value Outweighed; Authenticity	
0248	GOOG-FLO-00057733		Email from Steve Ganem to Google Analytics Leads titled "Fwd: [Please Read] Fabric	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of					Relevance; Personal Knowledge; Hearsay	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
			Deprecation MSA set for Wed 10/2 10am est"			contract, and invasion of privacy.					By Flo: Probative Value Outweighed; Authenticity	
0249	GOOG-FLO-00058814	8/3/2019	Document titled "Data for ML and the future of Measurement for Apps"	HC-AEO	Steve Ganem	Proof of Google's liability for violating CIPA; proof of Flo's violation of CMIA, breach of					Relevance; Personal Knowledge; Hearsay	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract, and invasion of privacy.					By Flo: Probative Value Outweighed; Authenticity	
0250	FLO-00004555 through FLO-00004575	6/21/2019	FTC Civil Investigative Demand on June 18, 2019 to Flo Health,		Flo Custodian for Authentication; FTC	Proof of Defendants' liability for breach of contract, CMIA,					Relevance; Probative Value Outweighed; Personal Knowledge;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
	1 20-00004373		Inc.		Representative	CIPA, invasion of privacy; proof rebutting affirmative					Hearsay; MIL	Balance favors admissibility (see Rules 401, 403).
						defenses					By Flo: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).
											By Google: Authenticity	The MIL is opposed.
												Not subsequent remedial measures and/or exception applies (see Rule 407).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0251	FLO-00066602	6/29/2020	Email Subject: A data deletion		Alexei Azarov	Proof of Defendants' liability					Hearsay	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
		2,.2020	request was submitted for flo.health (161488023)			for breach of contract, CMIA, CIPA, invasion of privacy;					By Flo & Meta: Subsequent	Balance favors admissibility (see Rules 401, 403).
			((			proof of damages					Remedial Measures; Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).
												Not subsequent remedial measures and/or exception applies (see Rule 407).

Filing	Starting Bates No.	Document Date Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Sponsoring Witness		Sponsoring Witness				3.3,	
0252	FLO-00066963	7/16/2019 Email Subject: Request to update	]	Roman Bugaev;	Proof of Defendants' liability					Hearsay	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
		and confirm your app's use of the Facebook SDK		Eugene Tiunovich	for breach of contract, CMIA, CIPA, invasion of privacy;					By Flo & Meta: Subsequent	Balance favors admissibility (see Rules 401, 403).
					proof of damages					Remedial Measures; Relevance; Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).
											Not subsequent remedial measures and/or exception applies (see Rule 407).
0253	FLO-00066982	9/26/2019 Email Subject: Re: Data Request	I	Eugene Tiunovich	Proof of Defendants' liability					No Certified Translation	Will present certified translation and/or translator as a witness.
					for breach of contract, CMIA, CIPA, invasion of privacy.					By Flo: Hearsay; Subsequent	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
										Remedial Measures; Relevance; Probative Value Outweighed;	Balance favors admissibility (see Rules 401, 403).
										Authenticity	
											Exhibit will be properly authenticated (see Rule 901).
											The exhibit is relevant (see Rules 401, 402).
0254	FLO-00066994	9/13/2019 Email Subject: Data Request		Eugene Tiunovich	Proof of Defendants' liability					No Certified Translation	Not subsequent remedial measures and/or exception applies (see Rule 407).  Will present certified translation and/or translator as a witness.
0234	FLO-00066994	9/13/2019 Email Subject: Data Request		Eugene Hunovich	for breach of contract, CMIA,					No Certified Translation	win present certified translation and/or translator as a witness.
					CIPA, invasion of privacy.					By Flo: Hearsay; Subsequent Remedial Measures; Relevance;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
										Probative Value Outweighed;	Balance favors admissibility (see Rules 401, 403).
										Authenticity	Exhibit will be properly authenticated (see Rule 901).
											The exhibit is relevant (see Rules 401, 402).
											Not subsequent remedial measures and/or exception applies (see Rule 407).
0255	FLO-00068389	2/3/2021 Email Subject: [JIRA] Denae	,	Valeriya Silenkova	Proof of Flo's liability for					MIL	No translation needed because document is in English.
		Thibault mentioned you on TS- 243			CMIA, intrusion upon seclusion, and breach of					By Flo: Hearsay; Subsequent	The MIL is opposed.
					contract claims; proof of damages claims					Remedial Measures; Relevance; Probative Value Outweighed; No	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					damages ciams					Certified Translation	
											Balance favors admissibility (see Rules 401, 403).
											The exhibit is relevant (see Rules 401, 402).
0256	FLO-00068489	9/17/2019 Email Subject: Facebook sharing	,	Valaniza Cilantraza	Proof of Defendants' liability					Dechativa Valua Outwaishadi MII i	Not subsequent remedial measures and/or exception applies (see Rule 407).  Will present certified translation and/or translator as a witness.
0230	FLO-00008489	9/1//2019 Email Subject. Facebook sharing		valeriya Shenkova	for breach of contract, CMIA,					No Certified Translation	
					CIPA, invasion of privacy.					By Flo: Hearsay; Relevance;	The MIL is opposed.
										Authenticity; Subsequent Remedial	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
										Measures	Balance favors admissibility (see Rules 401, 403).
											Exhibit will be properly authenticated (see Rule 901).
											The exhibit is relevant (see Rules 401, 402).
0257	FLO-00070873	3/27/2020 Email Subject: Appsflyer		Roman Bugaev	Proof of damages.					No Certified Translation	Not subsequent remedial measures and/or exception applies (see Rule 407).  Will present certified translation and/or translator as a witness.
1337		Communication									
										By Flo: Hearsay; Relevance; Probative Value Outweighed;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
										Authenticity	Balance favors admissibility (see Rules 401, 403).
											Exhibit will be properly authenticated (see Rule 901).
0.0	TV 0 000 F6									N 0 10 10 1	The exhibit is relevant (see Rules 401, 402).
0258	FLO-00072302	8/6/2019 Email Subject: Re: Обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon					No Certified Translation; Hearsay; Relevance; Probative Value	Will present certified translation and/or translator as a witness.
					seclusion, and breach of contract claims; proof of					Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					damages claims						Balance favors admissibility (see Rules 401, 403).
											Exhibit will be properly authenticated (see Rule 901).
											The exhibit is relevant (see Rules 401, 402).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0259	FLO-00072306	8/5/2019	Email Subject: Обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of					No Certified Translation; Hearsay; Relevance; Probative Value Outweighed; Authenticity	Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract claims; proof of damages claims					Outweighted, Authoritienty	Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												The exhibit is relevant (see Rules 401, 402).
0260	FLO-00072363	6/27/2019	Email Subject: Re: Очередное		Roman Bugaev	Proof of Flo's liability for					No Certified Translation; Hearsay;	Will present certified translation and/or translator as a witness.
			обвинение в сливе данных			CMIA, intrusion upon seclusion, and breach of					Relevance; Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract claims; proof of damages claims						Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												The exhibit is relevant (see Rules 401, 402).
0261	FLO-00072371	6/24/2019	Email Subject: Re: Очередное обвинение в сливе данных		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon					No Certified Translation; Hearsay; Relevance; Probative Value	Will present certified translation and/or translator as a witness.
			обынение в сливе данных			seclusion, and breach of contract claims.					Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0262	ET 0.00072400	4/20/2010	E 2011 - I 2 2 4 1		D D	D. C. CELL II LIV. C					N. C. off. 17. 1.5	The exhibit is relevant (see Rules 401, 402).
0262	FLO-00072409	4/29/2019	Email Subject: Invitation: Apple Discussion @ Tue Apr 30, 2019		Roman Bugaev	Proof of Flo's liability for CMIA, intrusion upon					No Certified Translation	Will present certified translation and/or translator as a witness.
			12pm-2pm (MSK) (r_bugaev@flo.health)			seclusion, and breach of contract claims.					By Flo: Hearsay; Relevance; Probative Value Outweighed;	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
											Authenticity	Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0263	FLO-00072590	2/26/2019	Email Subject : Re: Заявление		Domes Dyon or	Proof of Flo's liability for					No Certified Translation; Hearsay;	The exhibit is relevant (see Rules 401, 402). The exhibit is relevant (see Rules 401, 402).
0203	FLO-000/2590	2/26/2019	Flo и предыстория вопроса		Roman Bugaev	CMIA, intrusion upon					Relevance; Probative Value	The exhibit is relevant (see Rules 401, 402).
						seclusion, and breach of contract claims.					Outweighed; Authenticity	Will present certified translation and/or translator as a witness.
												Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
												Balance favors admissibility (see Rules 401, 403).
0264	FLO-00072636	2/27/2019	Email Subject: Re: Bayer/Flo: P	PR	Roman Bugaev	Proof of Flo's liability for					Relevance; MIL; Hearsay;	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).
0204	120-000/2030	2272017	strategy + analytical tools usage		Roman Buguev	CMIA, intrusion upon					Probative Value Outweighed	The Cambrids relevant (See Rates 401, 402).
						seclusion, and breach of						The MIL is opposed.
						contract claims; Proof of Plaintiffs' damages claims					By Google & Meta: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
												Balance favors admissibility (see Rules 401, 403).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0265	FLO-00072650	2/27/2019	Email Subject: Fwd: Bayer/Flo:		Roman Bugaev	Proof of Defendants' liability					Relevance; Hearsay; MIL	The exhibit is relevant (see Rules 401, 402).
			PR strategy + analytical tools usage			for breach of contract, CMIA, CIPA, invasion of privacy.					By Flo: Probative Value Outweighed	The MIL is opposed.
											Outweighted	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
												Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0266	FLO-00072767	9/17/2018	Email Subject: Re: Events for Google Analytics		Witness Roman Bugaev	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					Relevance  By Flo: Probative Value	The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.
											Outweighed; Authenticity  By Google & Meta: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0267	FLO-00072812	4/3/2019	Email Subject: Post mortem for WSJ - эдесь еще начали работать юристы, над		Roman Bugaev	Proof of Defendants' liability for breach of contract, CMIA, CIPA, invasion of privacy.					No Certified Translation; Hearsay; Relevance  By Flo: Probative Value Outweighed; Authenticity; MIL  By Google & Meta: Personal Knowledge	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).  Will present certified translation and/or translator as a witness.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  The MIL is opposed.
0268	FLO-00072814	Mar-21	Flo Investor deck March 2021		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  The exhibit is relevant (see Rules 401, 402).
0269	FLO-00074877	1/14/2021	Email Subject: Re: Flo – December monthly reporting pac	ŀk	Tamara Orlova; Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay; MIL By Flo: Authenticity	Balance favors admissibility (see Rules 401, 403).  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  The MIL is opposed.
0270	FLO-00075317	7/16/2020	Revenue 2018-2019 actuals – accrual basis		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed By Flo: Hearsay	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0271	FLO-00075585		Presentation titled: Latest trends with Flo 5.0 on board		Tamara Orlova	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0272	FLO-00075960	7/16/2020	Revenue 2018-2019-2020 actual – accrual basis	Is	Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance; Probative Value Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).
0273	FLO-00076771	1/10/2020	Email Subject: Re: Flo Health < WTI	>	Tamara Orlova	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims; Proof rebutting Defendants' affirmative defenses					Relevance; Hearsay  By Flo: MIL: Probative Value  Outweighed; Subsequent Remedial  Measures	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.
0274	FLO-00092941	3/25/2019	Email Subject: Re: Questions to Flo		Timofei Savitski	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; Proof of Plaintiffs' damages claims					Relevance; Hearsay; MIL  By Flo: Probative Value  Outweighed	The exhibit is relevant (see Rules 401, 402).  The MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).

T3*1*	G. C. D. V	D (D)	D (D ) (	Confidentiality	Plaintiffs'	District Control of the Control	D.C. I. (1	D. C. L. (JEJINE)	mi i dee i Oli di	D.C. L. (ID	D 6 1 (101) (	D. C. (CCL D.
Filing Order	Starting Bates No.	Document Date	Document Description	Designation	Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0275	FLO-00094528		Flo_ Apple_ Detailed Meeting		Max Scrobov	Proof of Defendants' liability					No Certified Translation; Hearsay	The exhibit is relevant (see Rules 401, 402).
			Follow-up (1)			for breach of contract, CMIA, CIPA, invasion of privacy.					By Flo: Authenticity; Relevance;	Will present certified translation and/or translator as a witness.
											Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0276	FLO-00094607		Flo Deck for Samsung		Max Scrobov	Proof of Flo's liability for					Probative Value Outweighed;	The exhibit is relevant (see Rules 401, 402).
						CMIA, intrusion upon seclusion, and breach of					Hearsay	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract claims					By Flo: Authenticity; Relevance; MIL	Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												The MIL is opposed.
0277	FLO-00094734		Post mortem for WSJ		Max Scrobov	Proof of Defendants' liability					Probative Value Outweighed;	The exhibit is relevant (see Rules 401, 402).
						for breach of contract, CMIA, CIPA, invasion of privacy.					Hearsay	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						CIFA, invasion of privacy.					By Flo: Authenticity; Relevance;	ivot nearsay (see Ruie 801) and/or nearsay objection applies (see Ruies 803, 804, 807).
											MIL	Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												The MIL is opposed.
0278	FLO-00094904	2/21/2018	Email Subject: Re: Bi-weekly business and project review		Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon					No Certified Translation	The exhibit is relevant (see Rules 401, 402).
			business and project review			seclusion, and breach of contract claims; Proof of					By Flo: Hearsay; Authenticity; Relevance; Probative Value	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						Plaintiffs' damages claims					Outweighed	Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												Will present certified translation and/or translator as a witness.
0279	FLO-00094932	1/9/2018	Email Subject : Ивенты фло		Max Scrobov	Proof of Flo's liability for					No Certified Translation;	The exhibit is relevant (see Rules 401, 402).
						CMIA, intrusion upon seclusion, and breach of					Relevance; Hearsay	N1 ( . D. 1. 001) . I/ . 1
						contract claims: Proof of					By Flo: Authenticity; Probative	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						Plaintiffs' damages claims					Value Outweighed	Balance favors admissibility (see Rules 401, 403).
											By Google & Meta: Personal Knowledge	Exhibit will be properly authenticated (see Rule 901).
											Tellowledge	Will present certified translation and/or translator as a witness.
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0280	FLO-00094933	10/23/2017	Events	Confidential	Max Scrobov	Proof of Defendants' liability for breach of contract, CMIA,					No Certified Translation;	The exhibit is relevant (see Rules 401, 402).
						CIPA, invasion of privacy.					Relevance; Hearsay	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
											By Flo: Authenticity; Probative Value Outweighed	Balance favors admissibility (see Rules 401, 403).
											By Google: Personal Knowledge	
											By Google: Personal Knowledge	Exhibit will be properly authenticated (see Rule 901).  Will present certified translation and/or translator as a witness.
0281	FLO-00095076	11/25/2017	Email Subject: Re: Amplitude		Max Scrobov	Proof of Flo's liability for					Relevance; Probative Value	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0281	FLO-00093076	11/23/2017	Commercials Follow Up		Wax Sciobov	CMIA, intrusion upon					Outweighed; Hearsay	ivot nearsay (see Kuie 801) and/or nearsay exception applies (see Kuies 805, 804, 807).
						seclusion, and breach of contract claims; Proof of						The exhibit is relevant (see Rules 401, 402).
						Plaintiffs' damages claims						Balance favors admissibility (see Rules 401, 403).
0282	FLO-00095085	11/24/2017	Amplitude <> Flo by		Max Scrobov	Proof of Flo's liability for					Relevance; Probative Value	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			OWHealth POC			CMIA, intrusion upon seclusion, and breach of					Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
						contract claims; Proof of						
						Plaintiffs' damages claims						Balance favors admissibility (see Rules 401, 403).

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0283	FLO-00095089	11/24/2017	Email Subject: Re: Amplitude		Max Scrobov	Proof of Flo's liability for					Relevance; Probative Value	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0283	FLO-00093089	11/24/2017	Commercials Follow Up		Wax Sciooov	CMIA, intrusion upon					Outweighed; Hearsay	(see Rule 801) and/of hearsay exception applies (see Rules 805, 804, 807).
			consider cases I one w op			seclusion, and breach of					Surveigned, Treatismy	The exhibit is relevant (see Rules 401, 402).
						contract claims; Proof of						
						Plaintiffs' damages claims						Balance favors admissibility (see Rules 401, 403).
0284	FLO-00095098	11/24/2017	Email Subject: Re: Amplitude		Max Scrobov	Proof of Flo's liability for					Relevance; Probative Value	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			Commercials Follow Up			CMIA, intrusion upon seclusion, and breach of					Outweighed; Hearsay	The exhibit is relevant (see Rules 401, 402).
						contract claims; Proof of						The exhibit is relevant (see Rules 401, 402).
						Plaintiffs' damages claims						Balance favors admissibility (see Rules 401, 403).
0285	FLO-00095194	10/14/2022	Additional Questions		Roman Bugaev	Proof of Defendants' liability					Relevance; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						for breach of contract, CMIA,						
0286	FLO-00095201	11/7/2019	A		D D	CIPA, invasion of privacy.  Proof of Flo's liability for					Relevance; Probative Value	The exhibit is relevant (see Rules 401, 402).
0286	FLO-00095201	11///2019	Aggregated Performance Report		Roman Bugaev	CMIA, intrusion upon					Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						seclusion, and breach of					Outweighed	The exhibit is relevant (see Rules 401, 402).
						contract claims; Proof of					By Flo: Hearsay	
						Plaintiffs' damages claims						Balance favors admissibility (see Rules 401, 403)
0287	FLO-00095218	7/6/2020	Roman Bugaev_Engineering		Roman Bugaev	Provides relevant background					Relevance; Hearsay	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						information for witness Roman Bugaev					By Flo: Probative Value	The exhibit is relevant (see Rules 401, 402).
						Bugaev					Outweighed	The exhibit is relevant (see Rules 401, 402).
											Outweighed	Balance favors admissibility (see Rules 401, 403).
0288	FLO-00096195	6/21/2019	FTC Civil Investigative Demand	I .	Timofei Savitski	Proof of Defendants' liability					Relevance; Probative Value	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
			to Flo Health, Inc.			for breach of contract, CMIA,					Outweighed; Hearsay; MIL	
						CIPA, invasion of privacy.						The exhibit is relevant (see Rules 401, 402).
											By Flo: Subsequent Remedial Measures	Balance favors admissibility (see Rules 401, 403).
												The MIL is opposed.
												Not subsequent remedial measures and/or exception applies (see Rule 407).
0289	FLO-00097215	10/14/2022	Excel Spreadsheet of App Events	s	Timofei Savitski	Proof of Flo's liability for					Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).
			Statistics			CMIA, intrusion upon						
						seclusion, and breach of					By Flo: Hearsay; Relevance	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract claims; Proof of Plaintiffs' damages claims						Balance favors admissibility (see Rules 401, 403).
0290	FLO-00101205	2/15/2019	Slack messages between Roman		Flo Custodian for	Proof of Flo's liability for					No Certified Translation	Will present certified translation and/or translator as a witness
0270	120-00101203	2/13/2019	Oreshko and Roman Bugaev		Authentication	CMIA, intrusion upon					To Certified Translation	with present certified datisfation and of datisfator as a witness
						seclusion, and breach of					By Flo: Hearsay; Authenticity;	The exhibit is relevant (see Rules 401, 402).
						contract claims; Proof rebutting	5				Relevance; Probative Value	
						Defendants' defenses					Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
												Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
0291	FLO-00101346	3/15/2017	Flo Product Strategy		Flo Custodian for	Proof of Flo's liability for						The exhibit is relevant (see Rules 401, 402).
					Authentication	CMIA, intrusion upon					Authenticity; Relevance; Probative	N. ( D. 1.001) 1 ( D. 1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.
						seclusion, and breach of contract claims; Proof rebutting					Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						Defendants' defenses	,					Balance favors admissibility (see Rules 401, 403).
												Exhibit will be properly authenticated (see Rule 901).
												Will present certified translation and/or translator as a witness
0292	FLO-00101510	6/29/2021	Flo's email notice to users re	-	Flo Custodian for	Proof of Flo's liability for					Hearsay; Relevance; Probative	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
0232	120-00101310	0/29/2021	FTC settlement		Authentication	CMIA, intrusion upon					Value Outweighed; MIL	two hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
						seclusion, and breach of						The exhibit is relevant (see Rules 401, 402).
						contract claims.					By Flo: Authenticity	
												Balance favors admissibility (see Rules 401, 403).
												The MIL is opposed.
												Exhibit will be properly authenticated (see Rule 901).
0293	GOOG-FLO-00091762	9/4/2015	Of Audiences and IDs	HC-AEO	Steve Ganem	Proof of Google's liability for					Relevance; Personal Knowledge;	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
						violating CIPA; proof of Flo's					Hearsay	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
						violation of CMIA, breach of contract, and invasion of					By Flo: Probative Value	authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						privacy.					Outweighed; Authenticity;	
						· ·	1	i e		1	, , ,,	

								Joint Preliminary Trial Frasco v. Flo Health, Inc., et al. (Ca			
Filing Order	Starting Bates No.	Document Date	Document Description	Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness		Plaintiffs' Objections	Defendants' Response	De
0294	FLO-00104753	5/24/2019	Data Retention and Disposal Policy		Timofei Savitski	Proof of Flo's liability for CMIA, intrusion upon					H V

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0294	FLO-00104753	5/24/2019	Data Retention and Disposal Policy		Timofei Savitski	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of					Hearsay; Relevance: Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).
						contract claims.					By Flo: Subsequent Remedial Measures	Balance favors admissibility (see Rules 401, 403).
0295	FLO-00105087	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages claims					Relevance: Probative Value Outweighed	Not subsequent remedial measures and/or exception applies (see Rule 407).  The exhibit is relevant (see Rules 401, 402).
0296	FLO-00105092	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages					Relevance: Probative Value	Balance favors admissibility (see Rules 401, 403). The exhibit is relevant (see Rules 401, 402).
0297	FLO-00105173	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages					Outweighed  Relevance: Probative Value	Balance favors admissibility (see Rules 401, 403). The exhibit is relevant (see Rules 401, 402).
0298	FLO-00105180	2/11/2020	Flo's Financial statements		Tamara Orlova	Proof of Plaintiffs' damages					Outweighed  Relevance: Probative Value	Balance favors admissibility (see Rules 401, 403). The exhibit is relevant (see Rules 401, 402).
0299	FLO-00105185	2/11/2020	Flo's Financial statements		Tamara Orlova	claims  Proof of Plaintiffs' damages					Outweighed  Relevance: Probative Value	Balance favors admissibility (see Rules 401, 403). The exhibit is relevant (see Rules 401, 402).
0300	FLO-00105481	2/11/2020	Flo's Financial statements		Tamara Orlova	claims  Proof of Plaintiffs' damages					Outweighed  Relevance: Probative Value	Balance favors admissibility (see Rules 401, 403). The exhibit is relevant (see Rules 401, 402).
0301	FLO-00105626	2/11/2020	Flo's Financial statements		Tamara Orlova	claims  Proof of Plaintiffs' damages					Outweighed  Relevance: Probative Value	Balance favors admissibility (see Rules 401, 403). The exhibit is relevant (see Rules 401, 402).
						claims					Outweighed	Balance favors admissibility (see Rules 401, 403).
0302	FLO-00106155	4/15/2023	Flo App Change Log (Android)		Flo Custodian for Authenticity	Proof of Flo's liability for breach of contract, CMIA, CIPA, invasion of privacy; proof of Meta and Google's					Hearsay; Relevance; Probative Value Outweighed; Authenticity	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  The exhibit is relevant (see Rules 401, 402).
						liability for violation of CIPA.						Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).
0303	FLO-00095115	11/23/2017	User data that Flo exported from	Confidential	Max Scrobov	Proof of Flo's liability for					Relevance; Probative Value	The exhibit is relevant (see Rules 401, 402).
0303	120 000/3113	11/23/2017	Flurry and sent to AppsFlyer	Communication	THE SECOND	CMIA, intrusion upon seclusion, and breach of contract claims; proof of					Outweighed; Hearsay; Authenticity  By Google: Personal Knowledge	
						damages, including punitive.					by deegle. Personal Philometage	Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0304	Frasco-AF-000078	2/19/2019	Flo's Order Form for ApplsFlyer's services		AppsFlyer Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of					Hearsay; Relevance; Probative Value Outweighed; Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Balance favors admissibility (see Rules 401, 403).
					Flo Custodian for Authentication	contract claims; proof of damages, including punitive.						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0305	BAY0000008_0001	1/31/2019	FemTech Update — Digital Channel Experiments		Flo Custodian for Authentication; Bayer Custodian for	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of					MIL; Relevance; Probative Value Outweighs; Personal Knowledge; Hearsay; Authenticity	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).
					Authentication	contract claims; proof of damages, including punitive.						Balance favors admissibility (see Rules 401, 403).
												Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0306	n/a	4/17/2023	Google's 2nd and 3rd		Oscar Takabvirwa	Proof of Flo's liability for					Relevance; Personal Knowledge	The exhibit is relevant (see Rules 401, 402).
0300	II d	4/1//2023	Supplemental Interrogatory		Kevin Lam	CMIA, intrusion upon					Reievance, i cisonai Knowieuge	The exhibit is relevant (see Rules 401, 402).
			Responses, Set 1			seclusion, and breach of					By Flo: Hearsay; Probative Value	Balance favors admissibility (see Rules 401, 403).
						contract claims; proof of Google's liability for violation of CIPA.					Outweighed; Authenticity	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						of CIPA.						Not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807).
												Exhibit will be properly authenticated (see Rule 901).
0307		Unknown	Firebase Analytics - Backend	HC-AEO	Steve Ganem	Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
	00092258		Processing Pipeline			CMIA, intrusion upon seclusion, and breach of					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of					By Flo: Probative Value	authenticated (see Rule 901), balance lavois admissionity (see Rules 401, 403)
						Google's liability for violation					Outweighed; Authenticity	
						of CIPA.						
0308	GOOG-FLO-00056960- 00057193	5/31/2018	Apps XFN Offsite	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon					Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
	00037173					seclusion, and breach of					Rilowicage	authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of					By Flo: Probative Value	
						Google's liability for violation of CIPA.					Outweighed; Authenticity	
0309	GOOG-FLO-00058113-	Unknown	Firebase Leadership Review	HC-AEO	Steve Ganem	Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
	00058149		Notes			CMIA, intrusion upon					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
						seclusion, and breach of						authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of Google's liability for violation					By Flo: Probative Value Outweighed; Authenticity	
						of CIPA.					Outweighed, Authenticity	
0310	GOOG-FLO-00059849-	8/29/2019	Analytics and Attribution 2020	HC-AEO	Kevin Lam	Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
	00060017		Strategy Offsite		Steve Ganem	CMIA, intrusion upon					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
						seclusion, and breach of contract claims; proof of					By Flo: Probative Value	authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						Google's liability for violation					Outweighed; Authenticity	
						of CIPA.						
0311	GOOG-FLO-00020088-	Unknown	Analytics Help webpage, "GA4		Google	Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
	00020089		Reporting identity"		representative	CMIA, intrusion upon seclusion, and breach of					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of					By Flo: Probative Value	addictituded (see Rate 701), ordance lavois admissionity (see Rates 401, 403)
						Google's liability for violation					Outweighed; Authenticity	
0212	COOC FY O 00001572	6/17/2010	E 7. 0. 0. #01	HC 1F0	G: G	of CIPA.					D.I. III D. I	77 177 1 4/4 P. 1 401 402 C. 1 4/4 11 11 11 11 11 11 11 11 11 11 11 11 11
0312	GOOG-FLO-00091573- 00091575	6/1//2019	Email to Steve Ganem re "GA (App + web) Ads Linking in	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon					Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
	00071373		GAFE - GA Leads Review"			seclusion, and breach of					ranomeage	authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of					By Flo: Probative Value	
						Google's liability for violation of CIPA.					Outweighed; Authenticity	
0313	GOOG-FLO-00088930-	Unknown	Gold for Apps	HC-AEO	Kevin Lam	Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
	00088936				Steve Ganem	CMIA, intrusion upon					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
						seclusion, and breach of						authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of Google's liability for violation					By Flo: Probative Value Outweighed; Authenticity	
						of CIPA.					Outweighed, Admendenty	
0314		7/1/2020	Google Analytics for Firebase -	HC-AEO	Kevin Lam	Proof of Flo's liability for					Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
	00062507		Accelerate Wells Fargo's app business with the GA for			CMIA, intrusion upon seclusion, and breach of					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
			Firebase SDK			contract claims; proof of					By Flo: Probative Value	authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						Google's liability for violation					Outweighed; Authenticity	
	1					of CIPA.				1		
0315	GOOG-FLO-00091793- 00091797	12/17/2019	Email from David Schachter to		Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon					Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
	00091/9/		multiple recipients re "GA4F and CCPA"	u		cmia, intrusion upon seclusion, and breach of					Knowicuge	authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of					By Flo: Probative Value	( ),
						Google's liability for violation					Outweighed; Authenticity	
0316	GOOG-FLO-00091831-	Unknown	Suggested App-specific FAQs to	HC AEC	Steve Ganem	of CIPA.  Proof of Flo's liability for				_	Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
0310	00091835	OHKHOWH	be added to go/ccpa-comms	IIC-AEU	Sieve Ganem	CMIA, intrusion upon					Knowledge	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly
	1		S			seclusion, and breach of						authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of					By Flo: Probative Value	
						Google's liability for violation of CIPA.					Outweighed; Authenticity	
	1	1	1	1	1	or CII A.	1	1				

Filing	Starting Bates No.	Document Dat	te Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
0317	GOOG-FLO-00090798- 00090816	6/20/2018	Gold-Based Targeting in Firebas	se HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0318	GOOG-FLO-00055992- 00056040	4/1/2018	App Ads SDK Strategy	HC-AEO	Steve Ganem	or CIPA.  Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0319	GOOG-FLO-00056678- 00056679	Undated	Employee evaluation of Steve Ganem Q4'18-Q1'19	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0320	GOOG-FLO-00062120- 00062376	Undated	Partnership App Immersion	HC-AEO	Kevin Lam	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0321	GOOG-FLO-00058263- 00058393	5/30/2019	Apps Leadership Onsite Meeting deck	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0322	GOOG-FLO-00082346- 00082354	6/24/2019	Email from Arsen Israpilov (Google) to Evegenia Olerinskaya (Google) re "DC Weekly Q2, 2019"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0323	GOOG-FLO-00081510- 00081511	4/18/2019	Certified translation - Email from Maria Volchenok (Google) to Anna Kitaevskaya (Flo) re "Flo Google // questions"		Evgenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0324	GOOG-FLO-00082477	7/24/2019	Certified translation - Email from Maria Volchenok (Google) to Anna Kitaevskaya (Flo) re "android video only campaigns request"	n HC-AEO	Evgenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0325	GOOG-FLO-00083127- 00083142	12/6/2019	Email from Maria Volchenok (Google) To Kseniya Kurchych (Flo) re "AppsFlyer support Update: Google Adwords Discrepancy"	HC-AEO	Evgenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0326	GOOG-FLO-00073910- 00073921	1/22/2021	Google Analytics webpage, "What's new"	HC-AEO	Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0327	GOOG-FLO-00067973- 00067974		Google Analytics webpage, "Advanced settings to allow for ads personalization"		Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of sectuated claims, proof of Google's liability for violation of CIPA.	S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo & Meta: Relevance; Hearsay; Probative Value Outweighed; Authenticity; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)

Starting Bate		23/2020	Uno Sensitive Data PRD	Designation HC-AEO	Witness Kevin Lam Steve Ganem	Proof of Flo's liability for	Sponsoring Witness			
00088958 0329 GOOG-FLO-		23/2020	Uno Sensitive Data PRD	HC-AEO		Proof of Flo's liability for				
	00093185- 9/2					CMIA, intrusion upon seclusion, and breach of			Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
	.00093185- 9/23					contract claims; proof of Google's liability for violation of CIPA.			By Flo: Probative Value Outweighed; Authenticity	
			Email from Yusuke Fujita (Google) to Denise Seligsohn (Google) re "GA4F - Data sharing: not to export gAds from	HC-AEO	Kevin Lam	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of			Relevance; Hearsay; Personal Knowledge By Flo: Probative Value	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
			Firebase"			Google's liability for violation of CIPA.			Outweighed; Authenticity	
0330 GOOG-FLO- 00091654	00091653- 8/30		Email from James Cote (Google) to Steve Ganem re "CCPA impact to GA and GA for Firebase"		Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of			Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of Google's liability for violation of CIPA.			By Flo: Probative Value Outweighed; Authenticity	
0331 GOOG-FLO- 00090262	.00090247- 3/1		Email from Anh Tran (Google) re "fork: Implementation of sensitive iba in UAM"		Ben Ewing	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of			Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rules 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of Google's liability for violation of CIPA.			By Flo: Probative Value Outweighed; Authenticity	
0332 GOOG-FLO- 00090063	.00090059- 3/7/	(	Email from Satvik Chauhan (Google) to multiple recipients re "SDK + UAC Commercialization		Ben Ewing	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of			Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
			Followup: App Sensitive Categories"			contract claims; proof of Google's liability for violation of CIPA.			By Flo: Probative Value Outweighed; Authenticity	
0333 GOOG-FLO- 00091972	00091970- 8/2:		Email from Thejas Durgam (Google) to multiple recipients re "Audience metadata"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of			Relevance; Hearsay; Personal Knowledge By Flo: Probative Value	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
						Google's liability for violation of CIPA.			Outweighed; Authenticity	
0334 GOOG-FLO- 00082915	00082913- 9/2:		Email from Maria Volchenok (Google) to AdWords Support, cc Flo Health, re "Ad Review"	HC-AEO	Evgenia Olerinskaya Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of			Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rules 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of Google's liability for violation of CIPA.			By Flo: Probative Value Outweighed; Authenticity	
0335 GOOG-FLO- 00078296	00078294- 10/2	,	Email from Ads Support to Maria Volchenok re "Campaign is only servicing text assets"	HC-AEO	Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of			Relevance; Hearsay; Personal Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rules 901); balance favors admissibility (see Rules 401, 403)
						contract claims; proof of Google's liability for violation of CIPA.			By Flo: Probative Value Outweighed; Authenticity	
0336 GOOG-FLO- 00085487	00085461- 11/2	(	Email from Nikita Strelnikov (Google) to Igor Krupski (Flo) re "Delivery Status Notification	HC-AEO	Eugene Tiunovich Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of			Personal Knowledge  By Flo & Meta: Probative Value	The exhibit is relevant (see Rules 401, 402); balance favors admissibilty (Rule 403); not hearsay (see Rule 801) and/or hearsay exception applies (see Rule 803, 804, 807); exhibit will be poperly authenticated (see Rule 901); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902)
		(	(Failure)"			contract claims; proof of Google's liability for violation of CIPA.			Outweighed; Authenticity  By Google & Meta: Relevance; No	Will present certified translation and/or translator as a witness.
0337 GOOG-FLO-	00078784- 10/	/16/2020	User Data Retention and Deletion	HC-AEO	Google	Proof of Flo's liability for			Certified Translation; Hearsay Relevance; Hearsay; Personal	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901,
00078791		•	Guidelines		representative	CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation			Knowledge  By Flo & Meta: Probative Value Outweighed; Authenticity	902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0330 0000 77.0	00001740	12010	C 76 W : WIL	HC 4FO	P .	of CIPA.				THE 17'S I AM AD COLOR OF THE THE THE THE TWO IS A COLOR OF THE
0338 GOOG-FLO-	00081749 6/14	(	Email from Maria Volchenok (Google) to Vlad Popa-Florea and Tanja Braendle re "FLO: Sensitive Firebase SDK case"	HC-AEO	Evegenia Olerinskaya Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of			Relevance; Hearsay; Personal Knowledge By Flo & Meta: Probative Value	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
			SCHEME I HOUSE SERVESC			Google's liability for violation of CIPA.			Outweighed; Authenticity	

Not subsequent remedial measures and/or exception applies (see Rule 407).

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0339	GOOG-FLO-00081853- 00081858	6/13/2019	Certified translation - Email from Evgenia Olerinskaya to Maria Volchenok re "Flo Planning"	HC-AEO	Evegenia Olerinskaya Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0340	GOOG-FLO-00084753- 00084754	9/29/2020	Email from Google Ads Support to Nikita Strelnikov (Google), cc Flo Health and Maria Volchenok, re "Personalized Ads policy 807- 232-5127"	HC-AEO	Evegenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0341	GOOG-FLO-00084859	10/14/2020	Email from Google Ads Support to Maria Volchenok, re "Personalized Ads policy 807- 232-5127"	HC-AEO	Evegenia Olerinskaya Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo & Meta: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0342	GOOG-FLO-00061865- 00061872	12/15/2020	Email from Maria Volchenok, cc Kevin Lam and Flo, re "Firebase + GDPR / CCPA"	HC-AEO	Kevin Lam Maria Volchenok	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0343	GOOG-FLO-00057427- 00057429	6/25/2019	Email from Nikita Strelnikof to Steve Ganem re "Firebase/ S2S instead of SDK / FLO"	HC-AEO	Steve Ganem Maria Volchenok Nikita Strelnikov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0344	GOOG-FLO-00057375	6/5/2019	Email from Onil Gunawardana (Google) to Steve Ganem re "Sensitive Category Data"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0345	GOOG-FLO-00055332- 00055423	6/1/2017	Slide deck, "Firebase + GA: Analytics Offsite"	HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance; Hearsay; Personal Knowledge By Flo: Probative Value Outweighed; Authenticity	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rule 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0346	GOOG-FLO-00037401- 00037402	1/30/2023	Google Analytics webpage, "Data sharing settings"	HC-AEO	Google representative	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.	Steve Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		By Flo & Meta: Hearsay; Relevance; Probative Value Outweighed; Authenticity; Persona Knowledge	The exhibit is relevant (see Rules 401, 402); foundation/personal knowledge will be established (see Rules 201, 602, 901, 902); not hearsay (see Rules 801) and/or hearsay exception applies (see Rules 803, 804, 807); exhibit will be properly 1 authenticated (see Rule 901); balance favors admissibility (see Rules 401, 403)
0347		6/9/2025	Defendant Google's Fifth Supplemental Responses to Plaintiffs' Interrogatories, Set One		Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Relevance, Hearsay, Personal Knowledge By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0348		7/1/2022	Defendant Meta's Responses and Objections to Plaintiffs' First Set of Interrogatories		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta' liability for violation of CIPA.	s				Hearsay, Personal Knowledge By Flo: Probative Value Outweighed By Meta: Subsequent Remedial Measures	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Balance favors admissibility (see Rules 401, 403).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).

Filing Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0349	10/31/2022	Defendant Meta's Supplemental			Proof of Flo's liability for					Hearsay, Personal Knowledge	The exhibit is relevant (see Rules 401, 402).
		Responses and Objections to Plaintiffs' First Set of Interrogatories		Liu, Karan Shah	CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's					By Flo: Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
		interrogatories			liability for violation of CIPA.					By Meta: Subsequent Remedial	Balance favors admissibility (see Rules 401, 403).
										Measures	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
										By Google: Relevance	Not subsequent remedial measures and/or exception applies (see Rule 407).
0350	9/6/2022	Defendant Meta's Responses and Objections to Plaintiffs' Second		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon					Hearsay, Personal Knowledge, Probative Value Outweighed	The exhibit is relevant (see Rules 401, 402).
		Set of Interrogatories			seclusion, and breach of contract claims; proof of Meta's					By Meta: MIL; Subsequent	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					liability for violation of CIPA.					Remedial Measures	Balance favors admissibility (see Rules 401, 403).
										By Google: Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Not subsequent remedial measures and/or exception applies (see Rule 407).
											MIL is opposed.
0351	12/7/2022	Defendant Meta's Responses and			Proof of Flo's liability for					Hearsay, Personal Knowledge	The exhibit is relevant (see Rules 401, 402).
		Objections to Plaintiffs' Fourth Set of Interrogatories		Authentication	CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's					By Flo: Authenticity; Probative Value Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					liability for violation of CIPA.					By Google: Relevance	Exhibit will be properly authenticated (see Rule 901).
										By Google. Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Balance favors admissibility (see Rules 401, 403).
0352 META-FRASCO- 0000369433	11/30/2022	Flo Health - Campaign Dates		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon					Hearsay, Personal Knowledge, Probative Value Outweighed; MII	The exhibit is relevant (see Rules 401, 402).
					seclusion, and breach of contract claims; proof of Meta's					By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					liability for violation of CIPA					By Meta: Relevance	Exhibit will be properly authenticated (see Rule 901).
											Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Balance favors admissibility (see Rules 401, 403).
											MIL is opposed.
0353 META-FRASCO- 0000001217	6/1/2021	Mobile App Custom Audiences Created by Flo Health from June		Meta Custodian for Authentication	Proof of Flo's liability for CMIA, intrusion upon					Hearsay, Personal Knowledge, Probative Value Outweighed; MII	The exhibit is relevant (see Rules 401, 402).
0000001217		2016 to June 2021		Authentication	seclusion, and breach of contract claims; proof of Meta's					By Flo: Authenticity	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					liability for violation of CIPA					By Meta: Relevance	Exhibit will be properly authenticated (see Rule 901).
										By Meta: Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Balance favors admissibility (see Rules 401, 403).
											MIL is opposed.
0354 META-FRASCO-	6/1/2021	Flo Health App Ad Optimization			Proof of Flo's liability for					Hearsay, Personal Knowledge,	The exhibit is relevant (see Rules 401, 402).
0000002286		Objectives June 2016 to June 2021		Authentication	CMIA, intrusion upon seclusion, and breach of					Probative Value Outweighed; MII	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
					contract claims; proof of Meta's liability for violation of CIPA					By Flo: Authenticity	Exhibit will be properly authenticated (see Rule 901).
										By Meta: Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Balance favors admissibility (see Rules 401, 403).
											MIL is opposed.
		1	1	1	1	1	I		- [	1	11

Filing Order	Starting Bates No.	Document Date	Document Description Confide Designa	entiality Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0355	META-FRASCO- 0000019631	6/1/2021	Meta Advertising Revenue Based on App Events Sent to Meta by the Flo App (June 1, 2016 to June 1, 2021)	11.5050000	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA; proof of damages, including punitive.					Hearsay, Personal Knowledge, Probative Value Outweighed; MIL By Flo: Authenticity By Meta: Relevance	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Exhibit will be properly authenticated (see Rule 901).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0356	FLO-00095166	2/6/2019	Email Subject: Flo Review Status	Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive. Rebutting					No Certified Translation, Hearsay  By Flo: Personal Knowledge	Balance favors admissibility (see Rules 401, 403).  MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.
0357	FLO-00098063	5/29/2019	Flo Competitive Advantages: Executive Summary.	Max Scrobov	affirmative defenses.  Proof of Flo's liability for CMIA; proof of damages, including punitive. Rebutting affirmative defenses.					Personal Knowledge, Hearsay; Relevance By Meta: MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0358	FLO-00095107	11/23/2017	Email from Max Scrobov to Dave Sherry. Re: "Amplitude Commercials Follow Up."	Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive. Rebutting affirmative defenses.					Hearsay, Relevance  By Flo: Personal Knowledge	MIL is opposed.  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0359	FLO-00094056	3/27/2020	Email from Max Scrobov to Timon Afinsky Re: WSJ Article. Chart listing quote mentioning Flo and Flo's comments.	Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance; MIL  By Flo: Personal Knowledge  By Meta: Probative Value  Outweighed	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).
0360	FLO-00094061	3/25/2020	Email from Dmitry Gurski to Nadia Antsiferova. Ce Max Scrobov. Re: Flo. Time-sensitive support and feedback required	Dmitry Gursky Max Scrobov	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation By Flo: Personal Knowledge	MIL is opposed.  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.
0361	FLO-00101589	4/20/2021	Short message Report-Outline of conversations. Eugene Tiunovich. Sergey Kleymenov.	Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge  By Meta: MIL	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).  MIL is opposed.
0362	FLO-00066841	6/13/2019	Email from Anna Kitaevskaya to Roman Bugaev. Re: Google Ads. (English & Russian version)	Roman Bugaev Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).
0363	FLO-00101444	10/2/2020	Short message-Outline of conversation. Ilya -Flo. Kiryl Prakopchyk, Lera Shchukina, Ilya Gnatuyuk.	Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages, including punitive.					Hearsay, Relevance, No Certified Translation By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.  The exhibit is relevant (see Rules 401, 402).

Filing Order	Starting Bates No.	Document Dat		onfidentiality esignation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0364	FLO-00101620	5/24/2021	Short message Report-Outline of conversations. Eugene Tiunovich, Ivan Borodulin.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract; proof of damages,				Hearsay, Relevance, No Certified Translation  By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						including punitive.					Will present certified translation and/or translator as a witness.
0365	FLO-00101383	8/22/2019	Short message Report-Outline of Conversations. Dmitry Silchenko. Eugene Tiunovich		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of				Hearsay, Relevance, No Certified Translation	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			Eugene Hunovien			contract claims; proof of Meta's liability for violation of CIPA; proof of damages, including				By Flo: Personal Knowledge	Will present certified translation and/or translator as a witness.
						punitive.					The exhibit is relevant (see Rules 401, 402).
0366	META-FRASCO- 0000006170	11/12/2019	Email from Eugene Tiunovich to Oleksii Bagdasarov. Re: Flo Health + Facebook/Intro Call.		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of				Hearsay, Relevance, No Certified Translation	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						contract claims; proof of Meta's liability for violation of CIPA.				By Flo: Authenticity, Personal Knowledge	Will present certified translation and/or translator as a witness.
											The exhibit is relevant (see Rules 401, 402).  Exhibit will be properly authenticated (see Rule 901).
0367	META-FRASCO-	1/28/2021	Email from Eugene Tiunovich to		Eugene Tiunovich	Proof of Flo's liability for				Personal Knowledge, Hearsay,	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
0307	0000006393	1/20/2021	Edward Dendievel. Re: "Can't create a campaign targeted at		Eugene Tianovien	CMIA, intrusion upon seclusion, and breach of				Relevance	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
			teenagers."			contract claims; proof of Meta's liability for violation of CIPA.				By Flo: Authenticity  By Meta: Probative Value	The exhibit is relevant (see Rules 401, 402).
										Outweighed	Exhibit will be properly authenticated (see Rule 901).  Balance favors admissibility (see Rules 401, 403).
0368	META-FRASCO-	1/14/2020	Email from Eugene Tiunovich to		Eugene Tiunovich	Proof of Flo's liability for				Hearsay, Relevance, No Certified	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
	0000021504		Oleksii Bagdasarov. Re:			CMIA, intrusion upon				Translation	
			Cpo4hble Bonpocbl no pabote facebook.			seclusion, and breach of contract claims; proof of Meta's liability for violation of CIPA;				By Flo: Authenticity, Personal Knowledge	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Will present certified translation and/or translator as a witness.
						proof of damages, including punitive.					The exhibit is relevant (see Rules 401, 402).
											Exhibit will be properly authenticated (see Rule 901).
0369	FLO-00067079	6/10/2021	Email from Eugene Tiunovich to		Eugene Tiunovich	Proof of Flo's liability for				Hearsay, Relevance; MIL	The exhibit is relevant (see Rules 401, 402).
			Edward Dendeviel & others. Re: FTC			CMIA, intrusion upon seclusion, and breach of contract; proof of damages,				By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						including punitive; rebut affirmative defenses.				By Meta: Subsequent Remedial Measures	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
											Not subsequent remedial measures and/or exception applies (see Rule 407).  MIL is opposed.
0370	FLO-00067080	6/10/2021	Email from Eugene Tiunovich to FB employees		Eugene Tiunovich	Proof of Flo's liability for CMIA, intrusion upon				Hearsay, Relevance; MIL	The exhibit is relevant (see Rules 401, 402).
			Subject: FTC screen			seclusion, and breach of contract; proof of damages,				By Flo: Personal Knowledge	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						including punitive; rebut affirmative defenses.				By Meta: Subsequent Remedial Measures; Cumulative (of FLO- 00067079)	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Not subsequent remedial measures and/or exception applies (see Rule 407).
											MIL is opposed.
0371	FLO-00067081		Flo screenshot		Eugene Tiunovich	Proof of Floir linkility for				Dalayanca Subsequent Dame 1:-1	Not cumulative or duplicative.  The exhibit is relevant (see Rules 401, 402).
03/1	FLO-0000/081		rio sercensnot		Eugene Hunovich	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of				Relevance, Subsequent Remedial Measures	Inc exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract; proof of damages, including punitive; rebut affirmative defenses.				By Flo: Personal Knowledge, Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
										By Meta: Authenticity	Not subsequent remedial measures and/or exception applies (see Rule 407).
						1		[			Exhibit will be properly authenticated (see Rule 901).

Filing Order	Starting Bates No.	Document Date	<b>Document Description</b>	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0372	FLO-00067083		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for					Relevance, Subsequent Remedial	The exhibit is relevant (see Rules 401, 402).
						CMIA, intrusion upon					Measures	
						seclusion, and breach of						Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract; proof of damages,					By Flo: Personal Knowledge,	E 1.2 ( 11 11 211 412 17 D 1 201 602 001 002)
						including punitive; rebut affirmative defenses.					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						annuative detenses.					By Meta: Authenticity	Not subsequent remedial measures and/or exception applies (see Rule 407).
												Exhibit will be properly authenticated (see Rule 901).
0373	FLO-00067082		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for					Relevance, Subsequent Remedial	The exhibit is relevant (see Rules 401, 402).
						CMIA, intrusion upon					Measures	
						seclusion, and breach of					D EL D LV L	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract; proof of damages, including punitive; rebut					By Flo: Personal Knowledge, Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses.					Ticaisay	i oulidation personal knowledge will be established (see Kules 201, 002, 701, 702).
											By Meta: Authenticity	Not subsequent remedial measures and/or exception applies (see Rule 407).
												Exhibit will be properly authenticated (see Rule 901).
0374	FLO-00067084		Flo screenshot		Eugene Tiunovich	Proof of Flo's liability for					Relevance, Subsequent Remedial	The exhibit is relevant (see Rules 401, 402).
						CMIA, intrusion upon seclusion, and breach of					Measures	Not hoovery (see Pule 201) and/or hoovery chiestian applies (see Pules 202, 204, 207)
						contract; proof of damages,					By Flo: Personal Knowledge,	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						including punitive; rebut					Hearsay	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses.						1 0 ( , , , , , , , , ,
											By Meta: Authenticity	Not subsequent remedial measures and/or exception applies (see Rule 407).
0375	FLO-00094867	0/6/2010	E I Com OWII M Comment		Man Caraban	Proof of Flo's liability for					Harris Barbatin Value	Exhibit will be properly authenticated (see Rule 901).
03/5	FLO-00094867	8/6/2018	Email from OWHealth Support to Max Scrobov. Re: Fwd: Did you		Max Scrobov	CMIA, intrusion upon					Hearsay, Probative Value Outweighed, MIL	The exhibit is relevant (see Rules 401, 402).
			sell my info?			seclusion, and breach of					Outweighed, WIL	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract; proof of damages,					By Flo: Personal Knowledge	
						including punitive; rebut						Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses.					By Meta: Relevance	
												Balance favors admissibility (see Rules 401, 403).
												MIL is opposed.
0376	FLO-00094080		Flo "Privacy & Security at Flo."		Max Scrobov	Proof of Flo's liability for					Personal Knowledge Hearsay MII	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
0370	120 00071000		The Titracy & Security at The		Max Berosov	CMIA, intrusion upon					r ersonar reno wreage, rrearsay, with	the hands (see hale of ) and of health objection applies (see hales obs, of ), of ).
						seclusion, and breach of					By Meta: Subsequent Remedial	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						contract; proof of damages,					Measures	
						including punitive; rebut						MIL is opposed.
						affirmative defenses.						Not subsequent remedial measures and/or exception applies (see Rule 407).
0377	FLO-00072578	3/15/2019	Screenshot-image of consent		Flo representative	Proof of Flo's liability for					By Meta: Relevance; Subsequent	
0377	FEO-00072378	3/13/2019	screen: "Welcome-I agree to		for authentication	CMIA, intrusion upon					Remedial Measures	The Camor is relevant (see reales 401, 402).
			Privacy Policy and Terms of		Roman Bugaev	seclusion, and breach of						Not subsequent remedial measures and/or exception applies (see Rule 407).
			Use."			contract; proof of damages,						
						including punitive; rebut						
0279	FLO-00102817		Chart Massaca Danast Carling or	£	Ele semuceentet'	affirmative defenses. Proof of Flo's liability for					Dansanal V navyladaa Dala	The architet is relayant (see Dyles 401, 402)
0378	FLO-0010281/		Short Message Report- Outline of Conversations. Zendesk ticket	1	Flo representative for authentication	Proof of Flo's hability for CMIA, intrusion upon					Personal Knowledge, Relevance, Hearsay, Probative Value	The exhibit is relevant (see Rules 401, 402).
			17903. Saina Shelton, Kate.		10. authoritication	seclusion, and breach of					Outweighed	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract; proof of damages,						,,,
						including punitive; rebut						Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
						affirmative defenses.						
												Balance favors admissibility (see Rules 401, 403).
0379	FLO-00072505	3/19/2019	Email from Jonas Mitschele to		Roman Bugaev	Proof of Flo's liability for					Personal Knowledge, Relevance,	The exhibit is relevant (see Rules 401, 402).
			Flo Health. Re: Bayer/Flo:			CMIA, intrusion upon					Hearsay; MIL	(,)
			analytical tools usage.			seclusion, and breach of						Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).
						contract; proof of damages,					By Meta: Probative Value	
						including punitive.					Outweighed	Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
												Balance favors admissibility (see Rules 401, 403).
												Same a ros animosomy (see rates vor, vor).
												MIL is opposed.

Filing Order	Starting Bates No. Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0380		Track app conversions with third- party app analytics	-	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Authenticity, Personal Knowledge, Hearsay  By Meta: Relevance	Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).
0381	GOOG-FLO-00057393 to GOOG-FLO-00057394	Email from Onil Gunawardana to Steve Ganem and Rahul Oak. "Fwd: Firebase/S2S instead of SDK/FLO."	) HC-AEO	Steve Ganem	Proof of Flo's liability for CMIA, intrusion upon sculusion, and breach of contract claims; proof of Google's liability for violation of CIPA; damages, including punitive.					Hearsay, Relevance By Flo: Personal Knowledge, Authenticity By Meta: MIL; Probative Value Outweighed	Exhibit will be properly authenticated (see Rule 901).  The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Balance favors admissibility (see Rules 401, 403).  Exhibit will be properly authenticated (see Rule 901).  MIL is opposed.
0382	GOOG-FLO-00089626 through 00089643	"Publisher Controls – App models"	HC-AEO	Google representative for authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Personal Knowledge, Hearsay, Relevance By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0383	GOOG-FLO-00000122 through 128	"Advertising Policies Help" webpage, section entitled "Personalized Advertising"		Google representative for authentication	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					By Meta: Personal Knowledge, Hearsay, Relevance By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0384	GOOG-FLO-00081220 11/7/2017	Email re "Re: Dating Weekly Plan Q4 2017" dated	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA.					Hearsay; Relevance By Flo: Authenticity, Personal Knowledge By Google: Personal Knowledge	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0385	GOOG-FLO-00081371 3/5/2019	Email re "[1-2433000025864] Advertiser, Market, and Competitive Insights (Case 1- 2433000025864)"	HC-AEO	Evgenia Olerinskaya	Proof of Flo's liability for CMIA, intrusion upon seclusion, and breach of contract claims; proof of Google's liability for violation of CIPA; damages, including punitive.					Personal Knowledge, Hearsay; Relevance By Flo: Authenticity	The exhibit is relevant (see Rules 401, 402).  Not hearsay (see Rule 801) and/or hearsay objection applies (see Rules 803, 804, 807).  Foundation/personal knowledge will be established (see Rules 201, 602, 901, 902).  Exhibit will be properly authenticated (see Rule 901).
0386	FLO-00104564 7/11/2017	Flo app Terms of Service, published July 11, 2017 and in effect through November 15				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0387	FLO-00104524 11/27/2017	11/27/2017 Terms of Service				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims				
0388	FLO-00104551 5/23/2018	5/23/2018 Terms of Service				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0389	To establish Flo's 5/24/2018 affirmative defense and rebut all of Plaintiff's claims	5/24/2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Inadmissible to the extent the exhibit is duplicative and therefore cumulative and waste of time	Not duplicative and is necessary to establishing Flo's affirmative defenses and rebutting all of Plaintiffs' claims	-	Not duplicative and is necessary to establishing Flo's affirmative defenses and rebutting all of Plaintiffs' claims
0390	FLO-00003107	Terms of Service [Undated]				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0391	FLO-00104557	6/22/2018	Flo app Terms of Service, Effective June 22, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims; Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
0392	FLO-00104530	11/16/2018	Flo app Terms of Service, published November 16, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plaintiffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0393	FLO-00104537	11/19/2018	Flo App Terms of Service, published November 19, 2018				S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plainitffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0394	FLO-00104544	12/26/2018	Flo app Terms of Service, published December 26, 2018 and in effect through February 5. 2018	,			S. Schumacher; M. Scrobov; C. Karkanias; Named Plainitffs; L. Lydon; Plainitffs' Experts	To establish Flo's affirmative defenses, including consent, and rebut all of Plaintiff's claims			-	
0395	FLO-CHEN-0000086	2/2/2021	Email from J. Yardley to ConsumersAdvocates.com re Health App Privacy Class Action Investigation	Confidential n			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Lack of Harm, Relevant to Witness Credibility	-		-	
0396	n/a	n/a	Biography of P. Chen, Garner & Associates LLP	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility	Not relevant to any claim or defense	Relevant to witness credibility and to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims	-	
0397	n/a	n/a	Bankruptcy docket for T. and J. Alexander, Case No. 8:94-bk- 17096-JW (C.D. Cal. Dec. 21, 1994)	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.		
0398	n/a	n/a	Bankruptcy docket for J. Chase, Case No. 09-43711 (E.D. Tex. Mar. 1, 2010)	n/a			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's Relevant to Lack of Harm, Relevant to Standing, Relevant to Witness Credibility	Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.	-	
0399		2007-12-26 (2023-01-20)	California Franchise Tax Board, Notice of State Tax Lien for J. Alexander				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility even if outside class period; relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.		

	Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
(	400		2008-08-29 (2023-01-20)	Income and Expense Declaration for J.Alexander, Case No. 98D010142, filed in Superior Court of California for the County of Orange		Witness		J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's, Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of	Not relevant to any claim or defense; undue prejudice; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to CIPA 632 claim even if outside class period;	-		
									Confidentiality, Relevant to Estoppel, Relevant to Witness Credibility		relevance and probative value outweigh any undue prejudice, confusion, or risk of misleading jury.			
(	401	FLO-CHEN-0000070	6/18/2019	Email from FollowMyHealth Patient Portal to J. Yardley re Health Record Update	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel			-		
		n/a	11/13/2019	Privacy Policy	n/a			J. Chen	and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to Consent, Relevant to License Defense		Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.			
(	403	FLO-CHEN-0000081	12/15/2020	Email from MyQuest to J. Yardley re Your Quest Diagnostics Lab Results are Now Available through MyQuest	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel			-		
(	404	n/a	12/30/2022	Quest Diagnostics Privacy Policy				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Consent, Relevant to License Defense					
		FLO-CHEN-0000079	5/17/2022	Email from MyUCDavisHealth to J. Yardley re New Message in Patient Portal				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	defense; outside class period	Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim even if outside class period.			
C	1406	FLO-CHEN-0000084	4/11/2018	Email from Teladoc to J. Yardley re Creation of Account	Confidential			J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's 'CIPA 632 claim, Relevant to Absence of Eavesdropping		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.	-		
(	407		1/20/2023	J. Chen Google Review of Yardley Healing Arts				J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality. Relevant to Estoppel		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim.			

Filing Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
			J J	Witness								
0408 FLO-00000285	n/a	OwHealth, Inc. Terms of Service	e Confidential			S. Schumacher; J. Chen	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	-		-		
						Chen	examination of the Named Plaintiffs;					
							Relevant to defending Plaintiffs' CIPA					
							632 claim, Relevant to Consent, Relevant to License Defense					
0409 FLO-CHEN-0000003	2/1/2019	Email with subject line: Your	Confidential			J. Chen	To establish Flo's affirmative defense	_		_	+	
1 EO-CHEN-000003	2/1/2019	personal Google+ account is	Connaciniar			J. Chen	and rebut all of Plaintiff's claims; cross-					
		going away on April 2, 2019					examination of the Named Plaintiffs					
							Relevant to defending Plaintiffs' CIPA 632 claim					
0410	+	Jennifer Chen 1/20/2023				J. Chen	To establish Flo's affirmative defense			-	+	
		Deposition Exhibit 136 - Email				J. Chen	and rebut all of Plaintiff's claims; cross-					
							examination of the Named Plaintiffs					
0411		Erica Frasco 1/23/2023 Deposition Exhibit 140 - Written				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Privileged attorney-client communication	This is not privileged, and, even if it were, any privilege	-		
		retention agreement	11				examination of the Named Plaintiffs	Communication	was waived by producing this			
									document in the course of			
									discovery.			
0412		Erica Frasco 1/23/2023 Deposition Exhibit 141 - Skills				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a Named Plaintiff and to	-		
		portion of LinkedIn profile of					examination of the Named Plaintiffs	detelise	establish Flo's affirmative			
		Erica Frasco							defenses and rebut all of			
									Plaintiffs' claims.			
0413		Erica Frasco 1/23/2023	_			E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a Named Plaintiff and to	-		
		Deposition Exhibit 142 - Course portion of LinkedIn profile of	s				examination of the Named Plaintiffs	detense	establish Flo's affirmative			
		Erica Frasco					Sammadon of the Families		defenses and rebut all of			
									Plaintiffs' claims.			
0414		Erica Frasco 1/23/2023 Deposition Exhibit 144 -				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a Named Plaintiff and to	-		
		Facebook birthday post,					examination of the Named Plaintiffs	detense	establish Flo's affirmative			
		11/29/2021							defenses and rebut all of			
									Plaintiffs' claims.			
0415		Erica Frasco 1/23/2023 Deposition Exhibit 145 - Erica				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a Named Plaintiff and to	-		
		Frasco's Facebook profile					examination of the Named Plaintiffs	detense	establish Flo's affirmative			
		Trasec s Taccocoa prome					Statistical of the 1 tankers		defenses and rebut all of			
									Plaintiffs' claims.			
0416		Erica Frasco 1/23/2023 Deposition Exhibit 146 -				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to	-		
		Facebook post, 12/30/2019					examination of the Named Plaintiffs	detelise	establish Flo's affirmative			
									defenses and rebut all of			
									Plaintiffs' claims.			
0417		Erica Frasco 1/23/2023 Deposition Exhibit 149 - Google				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-			-		
		privacy policy	;				examination of the Named Plaintiffs					
0418		Erica Frasco 1/23/2023				E. Frasco	To establish Flo's affirmative defense			-		
		Deposition Exhibit 150 - Plaintif	ff				and rebut all of Plaintiff's claims; cross-	•				
		Erica Frasco's					examination of the Named Plaintiffs					
		Responses and Objections to Defendant Google LLC's										
		Interrogatories to Plaintiff Erica										
		Frasco										
0419		Erica Frasco 1/23/2023 Deposition Exhibit 151 - Poosh				E. Frasco	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a Named Plaintiff and to	-		
		Deposition Exhibit 151 - Poosh information about the use of					and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's	detense	Named Plaintiff and to establish Flo's affirmative			
		cookies	1				Trained Flamelis		defenses and rebut all of			
									Plaintiffs' claims			
0420		Erica Frasco 1/23/2023				E. Frasco	To establish Flo's affirmative defense		Relevant to cross examine a Named Plaintiff and to	-		
		Deposition Exhibit 152 - Instagram liked posts	1				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	detense	Named Plaintiff and to establish Flo's affirmative			
		III. Marian incorposis					Sammadon of the France Fidilities		defenses and rebut all of			
									Plaintiffs' claims			
0421		Erica Frasco 1/23/2023				E. Frasco	To establish Flo's affirmative defense	Probative value substantially		-		
		Deposition Exhibit 153 -March 9 2009, Facebook post by Erica	9,				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	outweighed by danger of confusing the issues	any potential confusion because it is relevant to cross			
		Frasco					Sammadon of the France Fidilities	comazing the issues	examine a Named Plaintiff			
			1						and to establish Flo's			
									affirmative defenses and			
	1		1	1		1	1		rebut all of Plaintiffs' claims			

					1				1			
Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring witness					
0422			Erica Frasco 1/23/2023		77 121233		E. Frasco	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a		
			Deposition Exhibit 154 - October	r				and rebut all of Plaintiff's claims; cross-	defense	Named Plaintiff and to		
			23, 2020 Facebook post by Erica					examination of the Named Plaintiffs		establish Flo's affirmative		
			Frasco in the group The Grande							defenses and rebut all of		
			at Riverdale							Plaintiffs' claims		
0423	FLO-GAMINO-0002342	8/17/2009	Email from Facebook Business to	Confidential			T. Gamino	To establish Flo's affirmative defense			-	
			T. Gamino re Help your Page					and rebut all of Plaintiff's claims; cross-	defense; outside class period			
			audience stay engaged with new					examination of the Named Plaintiffs; Relevant to Waiver, Relevant to		establish Flo's affirmative defenses and rebut all of		
			content					Consent/Ratification, Relevant to		Plaintiffs' claims; not barred		
								Expectations of Confidentiality,		by class period because of		
								Relevant to Estoppel		Plaintiffs' pursuit of punitive		
								Relevant to Estopper		damages.		
										Relevant to witness		
										credibility even if outside		
										class period.		
0424	n/a	10/18/2020	T. Gamino Instagram Post	n/a			T. Gamino	To establish Flo's affirmative defense	Job-related post; not relevant	Relevant to cross examine a	-	
1								and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
								examination of the Named Plaintiffs;	outside class period	establish Flo's affirmative		
								Relevant to Waiver, Relevant to		defenses and rebut all of		
								Consent/Ratification, Relevant to		Plaintiffs' claims.		
								Expectations of Confidentiality,		Relevant to witness		
								Relevant to Estoppel		credibility even if outside		
										class period; "job-related		
										post" is not a proper basis for objection.		
0.40.5		10/0/2022					m o .			,		
0425		12/8/2022	Tesha Gamino ProPublica				T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-			-	
			Tracking PPP					examination of the Named Plaintiffs;	defense; outside class period (see Rules 401, 402)	establish Flo's affirmative		
								Relevant to defending Plaintiffs' CIPA	(see Rules 401, 402)	defenses and rebut all of		
								632 claim, Relevant to Waiver,		Plaintiffs' claims.		
								Relevant to Consent/Ratification.		Relevant to witness		
								Relevant to Expectations of		credibility even if outside		
								Confidentiality, Relevant to Estoppel,		class period.		
								Relevant to Witness Credibility				
0426		12/8/2022	Tesha Gamino ProPublica				T. Gamino	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
			Tracking PPP (Second Round)					and rebut all of Plaintiff's claims; cross-	defense; outside class period	Named Plaintiff and to		
								examination of the Named Plaintiffs;		establish Flo's affirmative		
								Relevant to defending Plaintiffs' CIPA		defenses and rebut all of		
								632 claim, Relevant to Waiver,		Plaintiffs' claims.		
								Relevant to Consent/Ratification,		Relevant to witness		
								Relevant to Expectations of		credibility even if outside		
								Confidentiality, Relevant to Estoppel,		class period.		
0427	FLO-GAMINO-0004274	7/10/2019	Email from FB Ads Team to T.	Confidential			T. Gamino	Relevant to Witness Credibility Relevant to Waiver, Relevant to	Not relevent to1-i-			
0427	FLO-GAMINO-00042/4	//19/2018	Gamino re Your First Facebook	Confidential			1. Gamino	Consent/Ratification, Relevant to	Not relevant to any claim or defense		•	
			Ads Receipt (Account ID:					Expectations of Confidentiality,	GOZOLISO			
			189133535125494)					Relevant to Estoppel				
0428	FLO-GAMINO-0004173	7/27/2018	Email from FB Ads Team to T.	Confidential			T. Gamino	Relevant to Lack of Harm, Relevant to	-		-	
			Gamino re your first promotion					Witness Credibility				
			just finished					1				
0429	FLO-GAMINO-0000530	3/15/2021	Email from FB Ads Team from	Confidential			T. Gamino	To establish Flo's affirmative defense			-	
			T. Gamino re Join the Facebook					and rebut all of Plaintiff's claims; cross-	defense; outside class period			
			Business Insights Panel					examination of the Named Plaintiffs;		establish Flo's affirmative		
								Relevant to Waiver, Relevant to		defenses and rebut all of		
								Consent/Ratification, Relevant to		Plaintiffs' claims; not barred		
								Expectations of Confidentiality,		by class period because of		
								Relevant to Estoppel		Plaintiffs' pursuit of punitive		
										damages. Relevant to witness		
										credibility even if outside		
										class period.		
0430	FLO-GAMINO-0004261	7/3/2018	Email from Top Class Actions to	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA	Not relevant to any claim or	·	-	
3430	25 0/14/11/0-0004201	,, 3, 2010	T. Gamino re Top Class Actions	Communication			1. Juliulo	632 claim, Relevant to Lack of Harm,	defense			
			& Lawsuits Newsletter					Relevant to Witness Credibility	-			
	-1		1	1	- II	1	1	,	1	I .		

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response   Defendants' Objections   Plaintiffs' Response
0431	n/a	n/a	T. Gamino @3evergang Instagram Page	n/a	Willess		T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel		m or Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.  Relevant to witness credibility and CIPA 632 claim.
0432	n/a	n/a	T. Gamino @teshagamino Instagram Page	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	m or Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims.  Relevant to witness credibility and CIPA 632 claim.
0433	n/a	6/20/2018	T. Gamino Facebook Posts	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	relevant to any claim or defense	Relevant to cross examine a  Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility: "Photos of children" is not a proper basis for objection.
0434	n/a	2/19/2021	T. Gamino 3evergang Instagran Post	n/a			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	relevant to any claim or defense; outside class period	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion.  Relevant to witness credibility and CIPA 632 claim even if outside class period; "Photos of children" is not a proper basis for objection.
0435	META- FRASCO- 0000077945	10/3/2018	T. Gamino Facebook Post	Confidential				To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	any claim or defense	Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiff's 'claims which outweighs potential confusion.  Relevant to witness credibility and CIPA 632 claim even if outside class period; "Photos of children" is not a proper basis for objection.
0436	n/a	9/5/2018	App photo reflecting 36 weeks into pregnancy	Confidential			T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	defense; probative value substantially outweighed by danger of confusing the issues	e Named Plaintiff and to d by establish Flo's affirmative

		-			I				I	I	l	
Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Witness		Sponsoring witness					
0437	META- FRASCO-	9/5/2018	Meta Platforms Business Record	Confidential	**************************************		T. Gamino	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	0000321573		of app photo about 36 weeks into					and rebut all of Plaintiff's claims; cross-	defense; probative value	Named Plaintiff and to		
			pregnancy					examination of the Named Plaintiffs;	substantially outweighed by	establish Flo's affirmative		
								Relevant to Waiver, Relevant to	danger of confusing the	defenses and rebut all of		
								Consent/Ratification, Relevant to	issues	Plaintiffs' claims which		
								Expectations of Confidentiality, Relevant to Estoppel		outweighs potential confusion.		
								Relevant to Estopper		Relevant to witness		
										credibility and CIPA 632		
										claim.		
0438	n/a	9/13/2018	App photo reflecting 36 weeks	Confidential			T. Gamino	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
			into pregnancy, with comment					and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
								examination of the Named Plaintiffs;	substantially outweighed by	establish Flo's affirmative		
								Relevant to Waiver, Relevant to	danger of confusing the	defenses and rebut all of		
								Consent/Ratification, Relevant to	issues	Plaintiffs' claims which		
								Expectations of Confidentiality,		outweighs potential confusion.		
								Relevant to Estoppel		Relevant to witness		
										credibility and CIPA 632		
										claim.		
0439	FLO-GAMINO-0000364	12/8/2022	T. Gamino Instagram Post	Confidential			T. Gamino	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
								and rebut all of Plaintiff's claims; cross-	defense; probative value	Named Plaintiff and to		
								examination of the Named Plaintiffs;	substantially outweighed by	establish Flo's affirmative		
								Relevant to defending Plaintiffs' CIPA	danger of confusing the	defenses and rebut all of		
								632 claim, Relevant to Waiver,	issues	Plaintiffs' claims which		
								Relevant to Consent/Ratification,		outweighs potential confusion.		
								Relevant to Expectations of Confidentiality, Relevant to Estoppel		Relevant to witness		
								Confidentiality, Relevant to Estopper		credibility and CIPA 632		
										claim; "Ultrasound photo" is		
										not a proper basis for		
										objection.		
0440	FLO-GAMINO-0005681	5/9/2018	Email from Babycenter to T.	Confidential			T. Gamino		Not relevant to any claim or		-	
			Gamino re Your pregnancy: 19					and rebut all of Plaintiff's claims; cross-	defense	Named Plaintiff and to		
			weeks					examination of the Named Plaintiffs;		establish Flo's affirmative		
								Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver,		defenses and rebut all of Plaintiffs' claims.		
								Relevant to Consent/Ratification,		Relevant to witness		
								Relevant to Expectations of		credibility and CIPA 632		
								Confidentiality, Relevant to Estoppel		claim.		
0441	FLO-GAMINO-0004751	1/21/2018	Email from Everyday Health to	Confidential			T. Gamino	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
			T. Gamino re Daily Digest for the					and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
			July 2015 Babies Group					examination of the Named Plaintiffs;	substantially outweighed by	establish Flo's affirmative		
								Relevant to defending Plaintiffs' CIPA	danger of confusing the	defenses and rebut all of		
								632 claim, Relevant to Waiver,	issues	Plaintiffs' claims which		
								Relevant to Consent/Ratification,		outweighs potential confusion.		
								Relevant to Expectations of Confidentiality, Relevant to Estoppel		Relevant to witness		
								Confidentiality, relevant to Estopper		credibility and CIPA 632		
										claim.		
0442	n/a	2/22/2019	Wall Street Journal, "You Give	n/a				Relevant to SOL Defense, Relevant to	-		-	
			Apps Sensitive Personal				S. Satterfield	Failure to Mitigate, Relevant to Consen	t			
			Information. Then They Tell									
0.115	,	2/22/2010	Facebook"				m1 1 100 1 m 11	n.i				
0443	n/a	2/22/2019		n/a				Relevant to SOL Defense, Relevant to	]-		-	
			Facebook sensitive health and other data"				S. Satterfield	Failure to Mitigate, Relevant to Consen	1			
0444	FLO-GAMINO-0000320	4/11/2018	Email with subject line:	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA	_		_	
0-1-1-1	20-07111110-0000320		Important updates on Google	Communitian			Gammo	632 claim				
			Analytics Data Retention and the					-				
			General Data Protection									
L			Regulation (GDPR)						<u>                                       </u>			

Joint Preliminary Trial Exhibit List
Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections Plaintiffs' Response
					Sponsoring Witness					
0445	FLO-GAMINO-0000366	6 7/9/2020	Email from Google to Empire Kiddies re Empire, complete your privacy checkup	Confidential		T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel			
0446		C 700 100 4 0	71 77 00 1 77 1						period.	
0446	n/a	6/22/2018	Flo Terms of Service, effective as of June 22, 2018	s n/a		T. Gamino; Plaintiffs; Flo Witness	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; See purposes as to the underlying documents		Though the exhibit is duplicative, it will be helpful for purposes of cross- examination, as the exhibit was used with the witness during her deposition.	
0447	n/a	n/a	Tease podcast Instagram page	n/a		T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense; probative value substantially outweighed by danger of undue prejudice	Relevant to cross examine a Named Plaintiff and to	
0448	META-FRASCO- 000078876	1/5/2019	T. Gamino Instagram Post	Confidential		T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Photo of child; not relevant to any claim or defense	Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims which outweighs potential confusion. Relevant to witness credibility and CIPA 632 claim; "Photo of child" is not a proper basis for objection	
0449	n/a	1/24/2021	T. Gamino Instagram Post	Confidential		T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	defense; outside class period	Relevant to cross examine a	
0450	META- FRASCO- 0000077834	9/25/2019	T. Gamino Instagram Post	Confidential		T. Gamino	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-examination of the Named Plaintiffs; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel		Relevant to cross examine a Named Plaintiff and to	
0451			Autumn Meigs 1/5/2023 Deposition Exhibit 39 - Screenshot of Autumn's Apple Watch			A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's		Named Plaintiff and to	

Filing Order Starting Bates No. Document E	Date Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0452	Autumn Meigs 1/5/2023		Witness		A. Meigs	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a		
0432	Deposition Exhibit 40 -				A. Meigs	and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to	-	
	Screenshot of Autumn's Apple					examination of the Named Plaintiffs	substantially outweighed by			
	Watch						danger of confusing the	defenses and rebut all of		
							issues	Plaintiffs' claims which		
								outweighs potential confusion		
0453	Autumn Meigs 1/6/2023				A. Meigs	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	_	
	Deposition Exhibit 41 - Facebook	k				and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
	post (Highly					examination of the Named Plaintiffs		establish Flo's affirmative		
	Confidential)							defenses and rebut all of		
0454	Autumn Meigs 1/6/2023				A. Meigs	To establish Flo's affirmative defense	Not relevant to any claim or	Plaintiffs' claims Relevant to cross examine a		
0434	Deposition Exhibit 42 - Public				71. Weigs	and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
	post (Highly					examination of the Named Plaintiffs		establish Flo's affirmative		
	Confidential)							defenses and rebut all of		
0.00	1. 1. 1. (1. (1. (1. (1. (1. (1. (1. (1.							Plaintiffs' claims		
0455	Autumn Meigs 1/6/2023 Deposition Exhibit 43 - GoodRx				A. Meigs	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a Named Plaintiff and to	-	
	privacy policy					examination of the Named Plaintiffs	defense	establish Flo's affirmative		
	privacy poncy					Statistical of the Familie Families		defenses and rebut all of		
								Plaintiffs' claims		
0456	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense			-	
	Deposition Exhibit 156 -					and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs				
0457	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense				
0437	Deposition Exhibit 157 -				J. I ICUZYK	and rebut all of Plaintiff's claims; cross-				
	Supplemental Responses					examination of the Named Plaintiffs				
	and Objections									
0458	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense			-	
	Deposition Exhibit 158 - Verification page					and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	•			
0459 FLO-00000211	Flo Consent screen				J. Pietrzyk	To establish Flo's affirmative defense	Lack of date of document and	Relevant to cross examine a	_	
0437	i to Consent sercen				J. I ICUZYK	and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
						examination of the Named Plaintiffs	cumulative	establish Flo's affirmative		
								defenses and rebut all of		
0460 FLO-00002762	Justine Pietrzyk 1/27/2023				I Distant	To establish Flo's affirmative defense	Document undated and	Plaintiffs' claims Relevant to cross examine a		
0460 FEO-00002762	Deposition Exhibit 160 - Flo's				J. Pietrzyk	and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to	-	
	privacy policy					examination of the Named Plaintiffs	cumulative	establish Flo's affirmative		
								defenses and rebut all of		
								Plaintiffs' claims		
0461	Justine Pietrzyk 1/27/2023 Deposition Exhibit 162 - Clue's				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a plaintiff and to establish Flo's	-	
	privacy policy					examination of the Named Plaintiffs	delense	affirmative defenses and		
	privacy poncy					camination of the (valued ) landing		rebut all of Plaintiffs' claims		
0462	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 163 - Email					and rebut all of Plaintiff's claims; cross-	defense; outside class period;	plaintiff and to establish Flo's		
						examination of the Named Plaintiffs	probative value substantially			
							outweighed by danger of confusing the issues	rebut all of Plaintiffs' claims which outweighs potential		
							confusing the issues	confusion; not barred by		
								class period because of		
								Plaintiffs' pursuit of punitive		
								damages		
0463	Justine Pietrzyk 1/27/2023 Deposition Exhibit 164 - Ovia				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-			-	
	privacy policy					examination of the Named Plaintiffs	defense, outside class period	affirmative defenses and		
	privacy poncy					Statistical of the Familie Families		rebut all of Plaintiffs' claims;		
								not barred by class period		
								because of Plaintiffs' pursuit		
0464	I	1	+		I Distance	To analytical Plate and the Co.	Not and annual to the state of	of punitive damages		
0464	Justine Pietrzyk 1/27/2023 Deposition Exhibit 165 - Email				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-			-	
	Deposition Exhibit 100 - Elian					examination of the Named Plaintiffs	derense, outside class period	affirmative defenses and		
								rebut all of Plaintiffs' claims;		
								not barred by class period		
								because of Plaintiffs' pursuit		
						1		of punitive damages		

Filing Order Starting Bates No. Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0465	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 166 - Email					and rebut all of Plaintiff's claims; cross-	defense; outside class period			
						examination of the Named Plaintiffs		affirmative defenses and		
								rebut all of Plaintiffs' claims; not barred by class period		
								because of Plaintiffs' pursuit		
								of punitive damages		
0466	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 167 -				-	and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	BabyCenter's privacy policy					examination of the Named Plaintiffs		affirmative defenses and		
								rebut all of Plaintiffs' claims;		
								not barred by class period because of Plaintiffs' pursuit		
								of punitive damages		
0467	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a		
	Deposition Exhibit 168 - Email					and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
						examination of the Named Plaintiffs	•	affirmative defenses and		
								rebut all of Plaintiffs' claims;		
								not barred by class period		
								because of Plaintiffs' pursuit of punitive damages		
0468	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevent to once eleim on			
0408	Deposition Exhibit 169 - Twitter				J. FICUZYK	and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's	-	
	Deposition Exhibit 105 - 1 witter					examination of the Named Plaintiffs	defense	affirmative defenses and		
								rebut all of Plaintiffs' claim		
0469	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or		-	
	Deposition Exhibit 170 - Twitter					and rebut all of Plaintiff's claims; cross-	defense	plaintiff and to establish Flo's		
						examination of the Named Plaintiffs		affirmative defenses and		
0470	Leading Distance 1/27/2022				I Distant	To analytical Flats of Community of Community	Not relevant to any claim or	rebut all of Plaintiffs' claim		
0470	Justine Pietrzyk 1/27/2023 Deposition Exhibit 171 -				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's	-	
	Instagram					examination of the Named Plaintiffs	defense	affirmative defenses and		
								rebut all of Plaintiffs' claim		
0471	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 172 -					and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	Instagram					examination of the Named Plaintiffs	inadmissible character	affirmative defenses and		
0472	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	evidence Not relevant to any claim or	rebut all of Plaintiffs' claim Relevant to cross examine a		
0472	Deposition Exhibit 173 - Email				J. Pietrzyk	and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's	-	
	Deposition Exhibit 173 - Email					examination of the Named Plaintiffs	derense, outside class period	affirmative defenses and		
								rebut all of Plaintiffs' claims;		
								not barred by class period		
								because of Plaintiffs' pursuit		
0.450					v 200 - 1	m		of punitive damages		
0473	Justine Pietrzyk 1/27/2023 Deposition Exhibit 174 -				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-		Relevant to cross examine a plaintiff and to establish Flo's	-	
	LinkedIn					examination of the Named Plaintiffs	detense	affirmative defenses and		
	Elikediii					examination of the Ivanica Figure 13		rebut all of Plaintiffs' claim		
0474	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or		-	
	Deposition Exhibit 175 -				1	and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	Facebook post					examination of the Named Plaintiffs		affirmative defenses and		
0.455					x 20			rebut all of Plaintiffs' claim		
0475	Justine Pietrzyk 1/27/2023 Deposition Exhibit 176 -				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-		Relevant to cross examine a plaintiff and to establish Flo's	-	
	Facebook post					examination of the Named Plaintiffs	defense	affirmative defenses and		
	r accook post					examination of the Ivanica Figure 13		rebut all of Plaintiffs' claim		
0476	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 177 -					and rebut all of Plaintiff's claims; cross-	defense	plaintiff and to establish Flo's		
	Facebook post					examination of the Named Plaintiffs		affirmative defenses and		
0.455	V Di . 1 4/05/005	1			v m:			rebut all of Plaintiffs' claim		
0477	Justine Pietrzyk 1/27/2023 Deposition Exhibit 178 -				J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a plaintiff and to establish Flo's	-	
	Deposition Exhibit 1/8 - Instagram post					examination of the Named Plaintiffs	uciclisc	affirmative defenses and		
	anagram post					Commission of the Ivanicu I families		rebut all of Plaintiffs' claim		
0478	Justine Pietrzyk 1/27/2023				J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 179 -				1	and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	Instagram post					examination of the Named Plaintiffs		affirmative defenses and		
	1	1	1					rebut all of Plaintiffs' claim		

Filing Starting Bates No. Document Da	te Document Description Confider		Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order	Designat	Sponsoring Witness		Sponsoring Witness					
0479	Justine Pietrzyk 1/27/2023			J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or		-	
	Deposition Exhibit 180 - Facebook post				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	- delense	plaintiff and to establish Flo's affirmative defenses and		
							rebut all of Plaintiffs' claim		
0480	Justine Pietrzyk 1/27/2023			J. Pietrzyk	To establish Flo's affirmative defense		Relevant to cross examine a	-	
	Deposition Exhibit 181 - Facebook post				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	- defense	plaintiff and to establish Flo's affirmative defenses and		
	racebook post				examination of the Named Flaminis		rebut all of Plaintiffs' claim		
0481	Justine Pietrzyk 1/27/2023			J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or		-	
	Deposition Exhibit 182 -				and rebut all of Plaintiff's claims; cross-	- defense; outside class period			
	Business record				examination of the Named Plaintiffs		affirmative defenses and rebut all of Plaintiffs' claim;		
							not barred by class period		
							because of Plaintiffs' pursuit		
0.100					T		of punitive damages		
0482	Justine Pietrzyk 1/27/2023 Deposition Exhibit 183 -			J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-	Not relevant to any claim or	Relevant to cross examine a plaintiff and to establish Flo's	-	
	Instagram post				examination of the Named Plaintiffs	inadmissible character	affirmative defenses and		
						evidence	rebut all of Plaintiffs' claim;		
							not barred by class period		
							because of Plaintiffs' pursuit of punitive damages		
0483	Justine Pietrzyk 1/27/2023			J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 184 -				and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	Instagram post				examination of the Named Plaintiffs	inadmissible character evidence	affirmative defenses and rebut all of Plaintiffs' claim;		
						CVIGENCE	not barred by class period		
							because of Plaintiffs' pursuit		
							of punitive damages		
0484	Justine Pietrzyk 1/27/2023 Deposition Exhibit 185 -			J. Pietrzyk	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross-		Relevant to cross examine a plaintiff and to establish Flo's	-	
	Instagram post				examination of the Named Plaintiffs	- detense	affirmative defenses and		
							rebut all of Plaintiffs' claim		
0485	Justine Pietrzyk 1/27/2023			J. Pietrzyk	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 186 - Email				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	- defense; outside class period	plaintiff and to establish Flo's affirmative defenses and		
					examination of the Ivanica I faintilis		rebut all of Plaintiffs' claim:		
							not barred by class period		
							because of Plaintiffs' pursuit		
0486	Justine Pietrzyk 1/27/2023			J. Pietrzyk	To establish Flo's affirmative defense		of punitive damages	_	
0480	Deposition Exhibit 187 -			J. I ICUZYK	and rebut all of Plaintiff's claims; cross-	_			
	Google's privacy policy				examination of the Named Plaintiffs				
0487	Leah Ridgway 1/13/2023			L. Ridgway	To establish Flo's affirmative defense			-	
	Deposition Exhibit 73 - Interrogatory responses				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	-			
0488	Leah Ridgway 1/13/2023			L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	_	
	Deposition Exhibit 74 - List of				and rebut all of Plaintiff's claims; cross-				
	items				examination of the Named Plaintiffs		affirmative defenses and		
							rebut all of Plaintiffs' claim; not barred by class period		
							because of Plaintiffs' pursuit		
							of punitive damages		
0489	Leah Ridgway 1/13/2023			L. Ridgway	To establish Flo's affirmative defense			-	
	Deposition Exhibit 75 - Facebook				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	- defense	plaintiff and to establish Flo's affirmative defenses and		
	post				CAMBINATION OF the INMINEU FIMILITIES		rebut all of Plaintiffs' claim		
0490	Leah Ridgway 1/13/2023			L. Ridgway	To establish Flo's affirmative defense		Relevant to cross examine a	-	
	Deposition Exhibit 76 - Facebook				and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	post				examination of the Named Plaintiffs	substantially outweighed by danger of confusing the	affirmative defenses and rebut all of Plaintiffs' claims		
						issues	which outweighs potential		
							confusion		
0491	Leah Ridgway 1/13/2023			L. Ridgway	To establish Flo's affirmative defense			-	
	Deposition Exhibit 77 - Photo				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	- defense	plaintiff and to establish Flo's affirmative defenses and		
					Camiliation of the Named Plaintiffs		rebut all of Plaintiffs' claim		
0492	Leah Ridgway 1/13/2023			L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 78 - Facebook				and rebut all of Plaintiff's claims; cross-	- defense	plaintiff and to establish Flo's		
	post				examination of the Named Plaintiffs		affirmative defenses and rebut all of Plaintiffs' claim		
						1	reout all of Plaintills claim	l .	

Filing Order Starting Bates No. Document Date		Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0493	Leah Ridgway 1/13/2023		witness		L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 79 - Facebook					and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	post					examination of the Named Plaintiffs		affirmative defenses and		
								rebut all of Plaintiffs' claim		
0494	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or		-	
	Deposition Exhibit 80 - Facebook					and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	defense	plaintiff and to establish Flo's affirmative defenses and		
	post					examination of the Named Plaintiffs		rebut all of Plaintiffs' claim		
0495	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or			
0.55	Deposition Exhibit 81 -				2. raagway	and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	Comments					examination of the Named Plaintiffs	substantially outweighed by	affirmative defenses and		
							danger of confusing the	rebut all of Plaintiffs' claims		
							issues	which outweighs potential		
								confusion		
0496	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant to cross examine a	-	
	Deposition Exhibit 82 -					and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs		plaintiff and to establish Flo's		
	Comments					examination of the Named Plaintiffs	substantially outweighed by danger of confusing the	affirmative defenses and rebut all of Plaintiffs' claims		
							issues	which outweighs potential		
							issues	confusion		
0497	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense	Not relevant to any claim or		-	
	Deposition Exhibit 83 -					and rebut all of Plaintiff's claims; cross-		plaintiff and to establish Flo's		
	Comments					examination of the Named Plaintiffs		affirmative defenses and		
								rebut all of Plaintiffs' claim		
0498	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense			-	
	Deposition Exhibit 84 - Pinterest					and rebut all of Plaintiff's claims; cross-	defense	plaintiff and to establish Flo's		
						examination of the Named Plaintiffs		affirmative defenses and rebut all of Plaintiffs' claim		
0499	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense		rebut all of Plaintiffs' claim		
0499	Deposition Exhibit 87 -				L. Kiugway	and rebut all of Plaintiff's claims; cross-				
	Responses to Interrogatories					examination of the Named Plaintiffs				
0500	Leah Ridgway 1/13/2023				L. Ridgway	To establish Flo's affirmative defense			-	
	Deposition Exhibit 88 - Amended					and rebut all of Plaintiff's claims; cross-				
	Objections and Responses					examination of the Named Plaintiffs				
0501 FLO-WELLMAN- 8/17/2015	Email from Amazon to S.	Confidential			S. Wellman	To establish Flo's affirmative defense	Not relevant to any claim or		-	
0002400	Wellman re Your Amazon.com order					and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs;	detense; outside class period	Named Plaintiff and to establish Flo's affirmative		
	order					Relevant to defending Plaintiffs' CIPA		defenses and rebut all of		
						632 claim, Relevant to Waiver,		Plaintiffs' claims.		
						Relevant to Consent/Ratification,		Relevant to witness		
						Relevant to Expectations of		credibility and CIPA 632		
						Confidentiality, Relevant to Estoppel		claim, even if outside class		
			1			1		period.		
0502 n/a n/a	S. Wellman LinkedIn Profile	n/a			S. Wellman	To establish Flo's affirmative defense		Relevant to cross examine a	-	
						and rebut all of Plaintiff's claims; cross-	to any claim or defense	Named Plaintiff and to		
						examination of the Named Plaintiffs; Relevant to Waiver, Relevant to		establish Flo's affirmative defenses and rebut all of		
						Relevant to Waiver, Relevant to Consent/Ratification, Relevant to		Plaintiffs' claims.		
						Expectations of Confidentiality,		Relevant to witness		
						Relevant to Estoppel, Relevant to		credibility and CIPA 632		
						Witness Credibility, Cross-Examination	1	claim; "Employment related"		
						of the Named Plaintiffs		is not a proper basis for		
								objection.		
0503 1/1/2023	Indiegogo's Privacy Policy		1		S. Wellman	To establish Flo's affirmative defense		Relevant to cross examine a	-	
	Effective Date: 1/1/2023					and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
						examination of the Named Plaintiffs;	defense	establish Flo's affirmative		
						Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Consent,		defenses and rebut all of Plaintiffs' claims.		
						Relevant to License Defense		Relevant to witness		
						Televant to License Detense		credibility and CIPA 632		
								claim; "Employer's privacy		
								policy" is not a proper basis		
			<u> </u>					for objection.		

	Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
	0504		5/6/2022	Indiegogo's Cookie Policy Effective Date: 5/6/2022				S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Consent, Relevant to License Defense		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility and CIPA 632 claim; "Employer's privacy policy" is not a proper basis for objection.	-	
-	0505	FLO-WELLMAN- 0002791	8/17/2007	Email from Google to S. Davidson re Thank you from Google!	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs; Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.		
	0506	FLO-WELLMAN- 0002792	9/10/2007	Email from Google to S. Davidson re Thank you from Google!	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Witness Credibility		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.		
	0507	FLO-WELLMAN- 0002668	7/3/2012	Email from Google to S. Davidson re Thanks for applying to Google	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Witness Credibility		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.		
	0508	FLO-WELLMAN- 0002871	6/25/2019	Email from Google to S. Davidson re Thanks for your interest in Google	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Witness Credibility		Relevant to cross examine a Named Plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claims. Relevant to witness credibility; "Email related to job application" is not a proper basis for objection.		
		FLO-WELLMAN- 0002703	10/11/2010	Email from Google Adsense to S. Davidson re Welcome to Google Adsense	Confidential			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to defending Plaintiff's CIPA 632 claim, Relevant to Witness Credibility	defense; probative value substantially outweighed by		-	
	0510	FLO-WELLMAN- 0001727	3/22/2018	Email with subject line: Important updates about the General Data Protection	Confidential			S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
	0511	n/a	n/a	S. Wellman Poshmark site	n/a			S. Wellman	To establish Flo's affirmative defense and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiff's; Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	Not relevant to any claim or defense	Relevant to cross examine a plaintiff and to establish Flo's affirmative defenses and rebut all of Plaintiffs' claim; not duplicative because this document was used with witness at deposition and will help for purposes of impeachment.  Relevant to witness credibility and CIPA 632		

Filing Starting Bates I	No. Document Date	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Sponsoring Witness		Sponsoring Witness					
0512 n/a	n/a	S. Wellman Pinterest site	n/a			S. Wellman	To establish Flo's affirmative defense	Not relevant to any claim or		-	
							and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs;	- defense	Named Plaintiff and to establish Flo's affirmative		
							Relevant to Waiver, Relevant to		defenses and rebut all of		
							Consent/Ratification, Relevant to		Plaintiffs' claims.		
							Expectations of Confidentiality,		Relevant to witness		
							Relevant to Estoppel		credibility and CIPA 632 claim.		
0513	12/20/2021	Indiegogo's Terms of Use				S. Wellman	To establish Flo's affirmative defense	Employer's terms of use; not		_	
0313	12/20/2021	Effective 12/20/2021				S. Weillian	and rebut all of Plaintiff's claims; cross-		Named Plaintiff and to		
							examination of the Named Plaintiffs;	defense; outside class period	establish Flo's affirmative		
							Relevant to defending Plaintiffs' CIPA		defenses and rebut all of		
							632 claim, Relevant to Consent, Relevant to License Defense		Plaintiffs' claims. Relevant to witness		
							Relevant to License Defense		credibility and CIPA 632		
									claim, even if outside class		
									period; "Employer's terms of		
									use" is not a proper basis for		
0514 FLO-00094826	8/24/2018	Flo: Women's Mobile Health				A. Klepchukova; D.	To provide relevant information about		objection.		
0314 FLO-00094820	0/24/2010	Product - Publicly Available				Gurski	the Flo app and to rebut Plaintiff's			-	
		Troduct Tubilety Transcore				Guisia	claims and request for damages.				
0515	3/31/2025	Flo Health - About Us - Publicly	,			A. Klepchukova; D.	To provide relevant information about			-	
		Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
							claims and request for damages.		background about Flo and its employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0516	3/31/2025	Flo Health - Medical Expertise -				A. Klepchukova; D.				-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
							claims and request for damages.		background about Flo and its employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0517	3/31/2025	Flo Health - Pass It On Project -				A. Klepchukova; D.				-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App, background about Flo and its		
							claims and request for damages.		employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0518	3/31/2025	Flo Health - Flo Accuracy -				A. Klepchukova; D.				-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its		
							ciains and request for damages.		employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0519	3/31/2025	Flo Health - Product Tour -				A. Klepchukova; D.			Relevant for information	-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its		
							canno and request for damages.		employees, and to rebut		
									Plaintiffs' claims and request		
0.500	200	77 11 m · · ·							for damages		
0520	3/31/2025	Flo Health - Tracking Cycle - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's			-	
		1 uoliciy Avanable				Guiski	claims and request for damages.	defense; outside class period	background about Flo and its		
							ciams and request for damages.		employees, and to rebut		
									Plaintiffs' claims and request		
0.404	2.004.00.00	THE RESERVE TO SERVE							for damages		
0521	3/31/2025	Flo Health - Getting Pregnant - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's	Not relevant to any claim or defense; outside class period		-	
		1 dollery Avanable				Guiski	claims and request for damages.	uciciise, outside ciass period	background about Flo and its		
							and request to duringes.		employees, and to rebut		
									Plaintiffs' claims and request		
	200	77 77 11 7							for damages		
0522	3/31/2025	Flo Health - Prenancy - Publicly Available				A. Klepchukova; D.				-	
		Avanable				Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	background about Flo and its		
							and request to duringes.		employees, and to rebut		
									Plaintiffs' claims and request		
							1		for damages		

Filing Starting Bates No.	Document Dat	te Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Sponsoring Witness		Sponsoring Witness					
0523	3/31/2025	Flo Health - App Reviews -				A. Klepchukova; D.	To provide relevant information about			-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0524	3/31/2025	Flo Health - Anonymous Mode -				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or		-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0525	3/31/2025	Flo Health - Flo Premium -				A. Klepchukova; D.	To provide relevant information about			-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0526	3/31/2025	Flo Health - Secret Chats -				A. Klepchukova; D.	To provide relevant information about			-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0527	3/31/2025	Flo Health - Symptom Checker -				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0528	3/31/2025	Flo Health - Health Library -				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0529	3/31/2025	Flo Health - Health 360 -				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0530	3/31/2025	Flo Health - Health Library -				A. Klepchukova; D.	To provide relevant information about			-	
		Getting Pregnany - Publicly				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		Available					claims and request for damages.		background about Flo and its		
						1			employees, and to rebut		
									Plaintiffs' claims and request		
									for damages		
0531	3/31/2025	Flo Health - Health Library -				A. Klepchukova; D.	To provide relevant information about			-	
		Pregnancy - Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
						1	claims and request for damages.		background about Flo and its		
									employees, and to rebut		
						1			Plaintiffs' claims and request		
						1			for damages		
0532	3/31/2025	Flo Helath - Health Library -				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Being a mom - Publicly				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		Available				1	claims and request for damages.		background about Flo and its		
							_		employees, and to rebut		
									Plaintiffs' claims and request		
						1			for damages		
0533	3/31/2025	Flo Health - Health Library -				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or		-	
		LGTBQ+ - Publicly Available				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
						1	claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
						1			for damages		
	•	•	•	•		•		•			·

Filing Starting Bates No. Order	Document Dat		Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0534	3/31/2025	Flo Health - Health Library - Quizzes - Publicly Available		Witness		A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0535	3/31/2025	Flo Health - Calculators - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		
0536	3/31/2025	Flo Health - Ovluation Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information	-	
0537	3/31/2025	Flo Health - Pregnancy Test Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		
0538	3/31/2025	Flo Health - Mesntrual Cycle Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0539	3/31/2025	Flo Health - Period Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period		-	
0540	3/31/2025	Flo Health - Implantation Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0541	3/31/2025	Flo Health - Pregnancy Weeks To Months Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0542	3/31/2025	Flo Health - Preganancy Due Date Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0543	3/31/2025	Flo Health - IVF and FET Due Date Calculator - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		
0544	3/31/2025	Flo Health - Due Date Calculator By Ultrasound - Publicly Available				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0545 FLO-00104754	n/a	"Welcome to Flo" Terms of Use and Privacy Policy Agreement Page	Confidential			Plaintiffs; Flo Witness; G. Zervas; C. Karkanias; RM Scrobov; L. Lydon	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages; Relevant to Consent	-		-	

Filing Order Starting Bates No.	Document Dat		Confidentiality Designation	Plaintiffs' Exhibit Purpose Sponsoring Witness	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0546	6/30/2022	Flo. (2022, June 30). "Flo, the leading female health app, launches' Anyonymous Mode' to further protect reproductive health information in wake of Roe v. Wade decision." - Publicly Available		Willess	A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
	12/12/2024	Wickham, A. et al. (2024, December 12). "Exploring Self- Reported Symptoms for Developing and Evaluating Digital Symptom Checkers for Polycystic Ovarian Syndrome, Endometriosis, and Uterine Fibroids: Exploratory Survey Study." JMIR Formative Research. https://formative.jmir.org/2024/1/ e65469			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		
0548	5/25/2021	Flo. (2021, May 25). "Flo Announces the Research Project on the Effect of Weight Changes on Fertility and Cycle." https://flo.health/collaborations/ac ademic-research/flo-announces- research-project-on-the-effect-of- weight-changes-on-fertility			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0549	6/25/2024	Prentice, C. et al. (2024, June 25). "Methods for evaluating the efficy and efectiveness of direct- to-consumer mobile health apps: a scoping review." BMC Digital Health. (2024) 2:31, https://doi.org/10.1186/s44247- 024-00092-x			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0550	4/21/2022	Bajaj, M. (2022, April 21).  "Rates of self-reported postpartum depressive symptoms in the United States before and after the start of the COVID-19 pandemic." Journal of Psychiatric Research 151 (2022) 108–112.			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0551	12/31/2021	Bradshaw, H. et al. (2021, December 31). "Risk factors associated with postpartum depressive symptoms: A multinational study." Journal of Affective Disorders 301 (2022) 345–351.			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		
	8/26/2022	Hantsoo, L. et al. (2022, August 26). "Premenstrual symptoms across the lifespan in an international sample: data from a mobile application." Archives of Women's Mental Health (2022) 25:903.–910 https://doi.org/10.1007/s00737- 022-01261-5			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintift's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		
	0/0/2023	Flo. (2023). "Mind the gaps: Menstrual and reproductive misinformation in the UK in 2023." https://flo.health/landings/reprodu ctive-health-report-uk			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0554	4/17/2025	Flo. "Reproductive Health." https://flo.health/experts/reproduc tive-health			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages		

Ellin Determine Determine	D	D D	C6-14-1	DI -:4:66-1	Districted Entitle D	D. for dontal	Defendantal Enhibit Promo	Distriction Objection	Defendental Deman	Defendental Objections	District D
Filing Order Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0555	3/3/2021	Jain, T. et al. "Characterization		Witness		A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
0333	3/3/2021	of polycystic ovary syndrome				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		among Flo app users around the					claims and request for damages.	, <sub>F</sub>	background about Flo and its		
		world." Reproductive Biology					1 0		employees, and to rebut		
		and Endocrinology (2021) 19:36							Plaintiffs' claims and request		
		https://doi.org/10.1186/s12958-							for damages		
		021-00719-y									
0556	5/7/2024	Mengelkoch, S. et al. (2024, May	/			A. Klepchukova; D.	To provide relevant information about			-	
		<ol><li>"Longitudinal associations between women's cycle</li></ol>				Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its		
		characteristics and sexual					ciainis and request for damages.		employees, and to rebut		
		motivation using Flo cycle							Plaintiffs' claims and request		
		tracking data." Scientific Reports							for damages		
		(2024) 14:10513,							_		
		https://doi.org/10.1038/s41598-									
		024-60599-1									
0557	5/2/2024	Cunningham, A.C., et al.				A. Klepchukova; D.	To provide relevant information about			-	
		"Efficacy of the Flo App in Improving Health Literacy,				Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	background about Flo and its		
		Menstrualand General Health,					ciainis and request for damages.		employees, and to rebut		
		and Well-Being in Women: Pilot							Plaintiffs' claims and request		
		Randomized Controlled Trial."							for damages		
		JMIR Mhealth Uhealth (2024)									
		12:54124									
		https://mhealth.jmir.org/2024/1/e 54124									
0558	12/5/2023	Peven, K. et al. "Assessment of a				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	_	
0330	12/3/2023	Digital Symptom Checker Tool's				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		Accuracy in Suggesting					claims and request for damages.	, <sub>F</sub>	background about Flo and its		
		Reproductive Health Conditions:							employees, and to rebut		
		Clinical Vignettes Study." JMIR							Plaintiffs' claims and request		
		Mhealth Uhealth (2023)							for damages		
		11:46718,									
		https://mhealth.jmir.org/2023/1/e 46718									
0559	4/26/2023	Zhaunova, L. et al.				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		"Characterization of Self-				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		reported Improvements in					claims and request for damages.		background about Flo and its		
		Knowledgeand Health Among							employees, and to rebut		
		Users of Flo Period Tracking							Plaintiffs' claims and request		
		App: Cross-sectional Survey."  JMIR Mhealth Uhealth (2023)							for damages		
		11:40427,									
		https://mhealth.jmir.org/2023/1/e									
		40427									
0560	1/10/2024	Kazlou, A. et al. "Effects of				A. Klepchukova; D.	To provide relevant information about			-	
		stress on pain in females using a				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		mobile health app in the Russia-					claims and request for damages.		background about Flo and its		
		Ukraine conflict." Nature NPJ Mental Health Research (2024)							employees, and to rebut Plaintiffs' claims and request		
		3:2;							for damages		
		https://doi.org/10.1038/s44184-									
		023-00043-w									
0561	6/24/2020	Grieger, J.A., and Norman, R.J.				A. Klepchukova; D.	To provide relevant information about			-	
		"Menstrual Cycle Length and				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		Patterns in a Global Cohort of Women Using a Mobile Phone					claims and request for damages.		background about Flo and its employees, and to rebut		
		App: Retrospective Cohort							Plaintiffs' claims and request		
		Study." J Med Internet Res							for damages		
		(2020) 22, iss. 6, 17109,							5		
		http://www.jmir.org/2020/6/e171									
0562	11/30/2022	09/ Ponzo, S. et al. "Menstrual cycle-	1			A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Dalayant for information		
0302	11/30/2022	associated symptoms and				A. Klepchukova; D. Gurski	the Flo app and to rebut Plaintiff's	Not relevant to any claim or defense; outside class period		<u></u>	
		workplace productivity in US				30000	claims and request for damages.	period	background about Flo and its		
		employees: A cross-sectional							employees, and to rebut		
		survey of users of the Flo mobile							Plaintiffs' claims and request		
		phone app." Digital Health							for damages		
		(2022) 8:1-12.									

# Case 3:21-cv-00757-JD Document 659-1 Filed 06/13/25 Page 64 of 115

Filing Starting Bates No. Order	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0563	2/25/2025	Consideration A #Designation		Witness		A. Klanabadaana D	To assert the selection of the selection	Ni-tlat-tla-i	Delement for information		
0363	2/23/2023	Cunningham, A. "Perimenopause symptoms, severity, and				<ul> <li>A. Klepchukova; D. Gurski</li> </ul>	To provide relevant information about the Flo app and to rebut Plaintiff's	Not relevant to any claim or defense; outside class period		-	
		healthcare seeking in women in				Guiski	claims and request for damages.	defense, outside class period	background about Flo and its		
		the US." NPJ Women's Health							employees, and to rebut		
		(2025) 3:12,							Plaintiffs' claims and request		
		https://doi.org/10.1038/s44294-							for damages		
0564	5/3/2024	025-00061-3				A. Klepchukova; D.	T :1 1 :: C :: 1 :	No. 1	D. L. C. C. C.		
0364	3/3/2024	Cunningham, A. et al. "Chronicling menstrual cycle				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's	defense; outside class period		-	
		patterns across the reproductive				Cursus	claims and request for damages.	defense, outside entis period	background about Flo and its		
		lifespan with real-world data."							employees, and to rebut		
		Scientific Reports (2024)							Plaintiffs' claims and request		
		14:10172; https://doi.org/10.1038/s41598-							for damages		
		024-60373-3									
0565	1/8/2025	Goddard, F. et al. "Female sexual				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		response among Flo app users in				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		the United States." NPJ Women's Health (2025) 3:2:					claims and request for damages.		background about Flo and its		
		Health (2025) 3:2; https://doi.org/10.1038/s44294-							employees, and to rebut Plaintiffs' claims and request		
		024- 00051-x							for damages		
0566	12/3/2020	Flo. (2020, December 3). "Flo				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Health, Bayer AG and Help				Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period			
		Group Research Collaboration					claims and request for damages.		background about Flo and its		
		partner to raise awareness about Heavy Menstrual Bleeding."							employees, and to rebut Plaintiffs' claims and request		
		https://flo.health/collaborations/in							for damages		
		novations/flo-health-and-bayer-									
		help-group- research-									
		collaboration									
0567	10/21/2021	Flo. (2021, October 21). "Flo at				A. Klepchukova; D.				-	
		the FIGO World Congress: How real world data can improve				Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	background about Flo and its		
		women's health."					ciams and request for damages.		employees, and to rebut		
		https://flo.health/newsroom/flo-at-	-						Plaintiffs' claims and request		
		the-figo-world-congress							for damages		
0568	2/12/2022	Flo. (2022, February 12). "Flo Offers Free Premium				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's	Not relevant to any claim or defense; outside class period		=	
		Subscriptions for US-based				Guiski	claims and request for damages.	derense, outside entiss period	background about Flo and its		
		Obstetricians and Gynecologists."	•				1 3		employees, and to rebut		
		https://flo.health/newsroom/free-							Plaintiffs' claims and request		
		premium-subscriptions-for-							for damages		
		obgyns									
0569	1/9/2025	ELTA. (2025, January 9).				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		"Invest in Lithuania': 351 million	ı			Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		reached the country last year.					claims and request for damages.		background about Flo and its		
		foreign investments of EUR 3 thousand will be created, jobs."							employees, and to rebut Plaintiffs' claims and request		
		https://madeinvilnius.lt/en/busines	s						for damages		
		s/Vilnius-market/invest-in-									
		Lithuania-last- year-the-country-									
		reached-EUR-351-million-									
		foreign-investment-will-create- over-3-thousand-jobs/									
0570	12/19/2017	Park, A. (2017, December 19).		1		A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
	-2.1,.2011	"Emily Ratajkowski: Periods				Gurski	the Flo app and to rebut Plaintiff's	defense	about the Flo App,		
		Don't Have to 'Be Something You	1				claims and request for damages.		background about Flo and its		
		Hide'." Glamour.							employees, and to rebut		
		https://www.glamour.com/story/e mily-ratajkowski-period-story							Plaintiffs' claims and request for damages		
0571	2/9/2018	Document containing link to				A. Klepchukova; D.	To provide relevant information about	Not relevant to any claim or		-	
		YouTube video, titled, "Lets's				Gurski	the Flo app and to rebut Plaintiff's	defense	about the Flo App,		
		Talk About it. Period. With					claims and request for damages.		background about Flo and its		
		Emily Ratajkowsky."							employees, and to rebut		
		https://www.youtube.com/watch? v=sFF15iqn8Po							Plaintiffs' claims and request for damages		
	1	v 31 1 1 1 1 1 1 1 1 0 1 0	1	1				1	ioi dailiages		

The last of the la	n	n (n ::	C Cl	DI 1 (100 1	DI 1 dee l D 2 d 1 D	D.C. J.	De l'APIRE	m : (:ee + O) :	D.C. 1. (15)	D. C. L. (101)	D1 1 (2001 D
Filing Order Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0572	6/14/2021	Flo. (2021, June 14). "Flo Health Inc. announces world-class parental leave policies." https://flo.health/newsroom/flo- health-world-class-parental-leave- policies				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0573	4/10/2025	Flo. (2025, April 10). "Flo Pass It On Project - Why we're gifting to worldwide." https://flo.health/pass-it-on- project				A. Klepchukova; D. Gurski; T. Orlova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0574		Document titled, "Why we made Flo Premium completely free for one billion women worldwide."				A. Klepchukova; D. Gurski; T. Orlova	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Authenticity	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0575	2/27/2025	Femtech Insider. (2025, February 27). "Flo Study Reveals Young Women Experience Perimenopause Symptoms Earlier Than Expected." https://femtechinsider.com/flostudy-reveals-young-women-experience-perimenopause-symptoms-earlier-than-expected/				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0576	2/25/2025	Flo. (2025, February 25). "It's Not Just Hot Flashes: Flo Study Reveals Early Psychological Impact of Perimenopause," published on the Flo website. https://flo.heatth/newsroom/flo- study-reveals-early-psychological- impact-of-perimenopause				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0577	2/25/2025	PR Newswire. (2025, February 25). "It's Not Just Hot Flashes: Flo Study Reveals Early Psychological Impact of Perimenopause."				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0578	2/25/2025	Price, S. (2025, February 25).  "Research roundup: biodegradable contraceptive to be developed, impact of the microbiome on fertility and more." Fem Tech World. https://www.femtechworld.co.uk/ news/research-roundup- biodegradable-contraceptive-to- be-developed-impact-of-the- microbiome-on-fertility-and- more/				A. Klepehukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0579	2/28/2025	Thompson, D. (2025, February 28). "Young Women Suffer Menopause Symptoms in Silence, Study Says." U.S. News. https://www.usnews.com/news/he alth-news/articles/2025-02-28/young-women-suffermenopause-symptoms-in-silence-study-says				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			

								Joint Preliminary Tri Frasco v. Flo Health, Inc., et al. (C				
Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0580		2/25/2025	Kelly, S. (2025, February 25). "Your 30s Aren't Too Early For Perimenopause – But Many Women Don't Realise It." Huffington Post. https://www.huffingtonpost.co.uk entry/signs-of-perimenopause-in- thirties_uk_67bdb1a8e4b088756 003ea9f?g1b	,	WARES		A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period		-	
0581		5/10/2021	Flo. (2021, May 10). "Flo Health App Launches New Slack Emojis to Encourage Period Talk in the Workplace." https://flo.health/newsroom/flo- launches-new-slack-emojis				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0582		4/13/2021	Flo. (2021, April 13). "Flo Partners with Phenomenal to Fight Period Stigma." https://flo.health/newsroom/flo- partners-with-phenomenal-to- fight-period-stigma				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period		-	
0583		10/15/2021	Flo. (2021, October 15). "Flo Health Launches Dedicated				A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's	Not relevant to any claim or defense; outside class period		-	

	"Your 30s Aren't Too Early For Perimenopause — But Many Women Don't Realise It." Huffington Post. https://www.huffingtonpost.co.uk/ entry/signs-of-perimenopause-in- thirties_uk_67bdb1a8e4b088756 003ca9f?g1b	Gurski the Flo app and to rebut Plaintiff's claims and request for damages.  defense; outside class period about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages	
0581 5/10/2021	Flo. (2021, May 10). "Flo Health App Launches New Slack Emojis to Encourage Period Talk in the Workplace."  https://flo.health/newsroom/flo- launches-new-slack-emojis	A. Klepchukova; D. Gurski  To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about the Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	
0582 4/13/2021	Flo. (2021, April 13). "Flo Partners with Phenomenal to Fight Period Stigma." https://flo.health/newsroom/flo- partners-with-phenomenal-to- fight-period-stigma	A. Klepchukova; D. Gurski  To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about He Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages  Relevant for information - defense; outside class period about Flo and its employees, and to rebut Plaintiff's claims and request for damages	
0583 10/15/2021	Flo. (2021, October 15), "Flo Health Launches Dedicated Pregnancy Loss Policy," https://flo.health/newsroom/flo- pregnancy-loss-policy	A. Klepchukova; D. Gurski  To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about He Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	
0584 12/3/2020	Flo. (2020, December 3). "Flo Partners with SEUD to Raise Awareness About Endometriosis." https://flo.health/collaborations/c ontent/flo-partners-with-seud-to- raise-awareness-about- endometriosis	A. Klepchukova; D. Gurski  To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	
0585 12/3/2020	Fio. (2020, December 3). "Fio Signs Cooperation Agreement with EBCOG." https://flo.health/collaborations/c ontent/flo-signs-cooperation- agreement-with-ebcog	A. Klepchukova; D. Gurski  the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about He Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	
0586 0/0/2024	Pham, T. (2024). "Time-Saving Strategies for OB-GYNs." Flo Health Inc.	A. Klepchukova; D. Gurski the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about He Flo App, about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	
0587 5/16/2023	Roberts, A. (2023, May 16). "A femtech company found itself in the middle of the Ukraine invasion. Here's how sticking by their employees massively paid off—and helped advance science." Fortune. https://fortune.com/europe/2023/0 5/16/femtech-ukraine-invasion-employees-science-tech-ann-roberts/	A. Klepchukova; D. Gurski the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about He Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	
0588 3/8/2022	Flo. (2022, March 8). "Supporting our Flo community in Ukraine." https://flo.health/newsroom/flo- ukraine-support	A. Klepchukova; D. Gurski; T. Orlova  To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense; outside class period about He Flo App, about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	
0589 2/16/2018	Flo. (2018, February 16). "Cooperation Agreement Between Flo and UNFPA Signed." https://flo.health/collaborations/c ontent/flo-and-unfpa-signed- cooperation-agreement	A. Klepchukova; D. Gurski the Flo app and to rebut Plaintiff's claims and request for damages.  Not relevant to any claim or defense about He Flo App, background about Flo and its employees, and to rebut Plaintiff's claims and request for damages.	

Filing Starting Bates No. Order	Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0590	3/5/2020	Flo. (2020, March 5). "Dr. Natalia Kanem, UNFPA Executive Director, Visits Flo's Office." https://flo.health/newsroom/unfpa	i-	William		A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request	-	
		director-visits-flo							for damages		
0591	2/2/2022	Askham, G. (2022, February 2).  "After 357,657 votes, the winners of GLAMOUR's Wellness Power List 2022 are in! These are the 52 wellness buys really worth your money," Glamour Magazine. https://www.glamourmagazine.ce uk/gallery/wellness-power-list- 2022	e 1			A. Klepchukova; D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0592	1/8/2019	Flo. (2019, January 8). "Flo Has Been Selected as a CES 2019 Innovation Awards Honoree." https://flo.health/newsroom/flo- ces-2019-innovation-awards- honoree				D. Gurski	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages	-	
0593	1/8/2019	Flo. (2019, January 8). "Flo Announced as a Silver Honoree of 20th Anniversary Digital Health Awards Fall Session 2018." https://flo.health/newsroom/flo- silver-2018-digital-health-awards	s			D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense			
0594	5/2/2023	Flo. (2023, May 2). "Flo Health' "Anonymous Mode" feature named as a finalist in the Rapid Response category of Fast Company's 2023 World Changing Ideas Awards." https://flo.health/newsroom/flo-health-anonymous-mode	S			D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0595	4/16/2025	Zara, C. (2025, April 16). "World Changing Ideas Awards 2023: Rapid Response finalists and honorable mentions." Fast Company. https://www.fastcompany.com/90 870709/world-changing-ideas- rapid-response-2023				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period		-	
0596	5/2/2024	Editorial Team. (2024, May 2). "Femtech World Awards: Winners announced." Femtech World.				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			
0597	11/15/2022	Bryant, J. "Dechert's work on Flo's 'Anonymous Mode,' Amurabi's design of King'sprivacy notice win 2022 IAPP Privacy Innovation Awards." IAPP. https://iapp.org/news/a/flos- anonymous-mode-kings-privacy- notice-win-2022-hpe-iapp- privacy-innovation-awards/				D. Gurski; R. Bugaev; L. Lydon; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period			

Filing Starting Bates No.	Document Dat	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order Starting Bates 100	Document Date	Document Description	Designation	Sponsoring Witness	Zamok i ui pose	Sponsoring Witness	Detendants Exmon Ful post	Timining Objections	Detendants recipolise	Determines Objections	- manuar respons
0598	11/13/2024	PICCASO Awards. (2024,		** reness		D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		November 13). "PICCASO					the Flo app and to rebut Plaintiff's	defense; outside class period			
		Awards Europe 2024 Celebrates				Scrobov	claims and request for damages.		background about Flo and its		
		Industry Leaders in Data,							employees, and to rebut		
		Privacy, and Information Security Excellence."							Plaintiffs' claims and request for damages		
		https://www.piccasoawards.com/							ioi damages		
		blog/piccaso-awards-europe-									
		2024-celebrates-industry-leaders-									
		in-data-privacy-and									
0599	4/16/2025	PICCASO Awards. (2025, April				D. Gurski; R.	To provide relevant information about			-	
		16). "Shortlist for the 2024					the Flo app and to rebut Plaintiff's	defense; outside class period			
		Awards."				Scrobov	claims and request for damages.		background about Flo and its		
		https://www.piccasoawards.com/ 2024-shortlist							employees, and to rebut Plaintiffs' claims and request		
		2024-310/11/31							for damages		
0600	7/17/2023	PICCASO Awards. (2023, July				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or		-	
		17). "PICCASO Privacy					the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		PICCASO Privacy Awards				Scrobov	claims and request for damages.		background about Flo and its		
		Europe Shortlist for 2023							employees, and to rebut		
		Revealed Awards Europe							Plaintiffs' claims and request		
		Shortlist for 2023 Revealed." https://www.piccasoawards.com/							for damages		
		blog/piccaso-privacy-awards-									
		europe-shortlist-for-2023-									
		revealed									
0601	8/27/2018	Flo. (2018, August 27).				D. Gurski; R.	To provide relevant information about			=	
		"OWHealth Chosen as a 2017					the Flo app and to rebut Plaintiff's	defense	about the Flo App,		
		Red Herring Top 100 North				Scrobov	claims and request for damages.		background about Flo and its		
		America Winner." https://flo.health/newsroom/owhe							employees, and to rebut Plaintiffs' claims and request		
		alth-chosen-as-a-2017-red-							for damages		
		herring-top-100-north-america-							ioi damages		
		winner									
0602	12/6/2023	The Drum Editorial. (2023,				D. Gurski; R.	To provide relevant information about			-	
		December 6). "Flo Health on how	7				the Flo app and to rebut Plaintiff's	defense; outside class period			
		its content drove daily app usage				Scrobov	claims and request for damages.		background about Flo and its		
		with pregnant mothers." The Drum.							employees, and to rebut Plaintiffs' claims and request		
		https://www.thedrum.com/news/2							for damages		
		023/12/06/flo-health-how-its-							ioi damages		
		content-drove-daily-app-usage-									
		with-pregnant-mothers									
0603	11/2/2023	Flo. (2023, November 2). "Flo				D. Gurski; R.	To provide relevant information about			-	
		Health's "Anonymous Mode" feature recognized as one of				Bugaev; L. Lydon; M. Scrobov	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its		
		TIME's List of Best Inventions				SCIODOV	cianns and request for damages.		employees, and to rebut		
		2023."							Plaintiffs' claims and request		
		https://flo.health/newsroom/time-							for damages		
		best-inventions-2023									
0604	3/15/2021	Flo. (2021, March 15). "Building				D. Gurski; R.	To provide relevant information about			-	
		a secure space for millions of				Bugaev; L. Lydon; M. Scrobov	the Flo app and to rebut Plaintiff's	defense; outside class period			
		women worldwide through 1Password."				SCIODOV	claims and request for damages.		background about Flo and its employees, and to rebut		
		https://flo.health/newsroom/buildi							Plaintiffs' claims and request		
		ng-a-secure- space-for-millions-							for damages		
		of-women-worldwide-through-							_		
		1password									
0605	4/16/2025	Flo. (2025, April 16). "An added				D. Gurski; R.	To provide relevant information about			-	
		layer of privacy for your personal				Bugaev; L. Lydon; M. Scrobov	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its		
		https://flo.health/product-				SCIODOV	cianns and request for damages.		employees, and to rebut		
		tour/anonymous-mode							Plaintiffs' claims and request		
		,							for damages		
L 1		1	1	1	+	1	1	1		1	

Filing		Document Dat	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
Orde	r			Designation	Sponsoring		Sponsoring Witness						
0606		9/14/2022	El (2022 C . 1 14) IEI		Witness		D. Gurski; R.	T 11 1 11 6 6 1 1 1	NT - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	D.1. (C. ) C. ()			
0606		9/14/2022	Flo. (2022, September 14). "Flo 'Anonymous Mode' Now Live,					To provide relevant information about the Flo app and to rebut Plaintiff's	Not relevant to any claim or defense; outside class period		Ī		
			Offering Significant				Scrobov	claims and request for damages.	defense, outside class period	background about Flo and its			
			Advancement in the Privacy and				SCIODOV	ciainis and request for damages.		employees, and to rebut			
			Security of Reproductive Health							Plaintiffs' claims and request			
			Data."							for damages			
			https://flo.health/newsroom/flo-							ioi damages			
			anonymous-mode-now-live										
0607		5/1/2024	Flo. (2024, May 1). "Flo				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Delevent for information			
0007		3/1/2024	Anonymous Mode overview."					the Flo app and to rebut Plaintiff's	defense; outside class period		[		
			Anonymous wode overview.				Scrobov	claims and request for damages.	defense, outside class period	background about Flo and its			
							SCIODOV	cianns and request for damages.		employees, and to rebut			
										Plaintiffs' claims and request			
										for damages			
0608		6/28/2023	Flo. (2023, June 28). "Flo Health				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or		I_		
0008		0/20/2023	Open-Sources Award-Winning					the Flo app and to rebut Plaintiff's	defense; outside class period				
			Anonymous Mode Feature,				Scrobov	claims and request for damages.	derense, oanside emiss period	background about Flo and its			
			Encourages Stricter Privacy for				Bereser	ename and request for damages.		employees, and to rebut			
			Femtech Industry."							Plaintiffs' claims and request			
			https://flo.health/newsroom/anony							for damages			
			mous-mode-feature							for damages			
0609		4/16/2025	Flo. (2025, April 16). "Flo's		+		D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	_		
0009		4/10/2023	responsible vulnerability					the Flo app and to rebut Plaintiff's	defense; outside class period		Ī		
			disclosure program."				Scrobov	claims and request for damages.	defense, outside class period	background about Flo and its			
			https://flo.health/responsible-				Berobov	ciamis and request for damages.		employees, and to rebut			
			vulnerability-disclosure-program							Plaintiffs' claims and request			
			vaniciaointy-disclosure-program							for damages			
0610		8/4/2021	HackerOne. (2021, August 4).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or				
0010		0/4/2021	"One Month of Learnings from					the Flo app and to rebut Plaintiff's	defense; outside class period				
			Flo Health's Bug Bounty				Scrobov	claims and request for damages.	defense, outside class period	background about Flo and its			
			Program: A Q&A with CISO,				Berobov	ciamis and request for damages.		employees, and to rebut			
			Leo Cunningham."							Plaintiffs' claims and request			
			https://www.hackerone.com/blog/							for damages			
			one-month-learnings-flo-healths-							ioi damages			
			bug-bounty-program-qa-ciso-leo-										
			cunningham										
0611		7/9/2019	Flo. (2019, July 9). "How Flo				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	I_		
0011		11312013	Helps Safeguard Customer Data					the Flo app and to rebut Plaintiff's	defense; outside class period				
			With Cloudflare, One of the				Scrobov	claims and request for damages.	derense, oanside emiss period	background about Flo and its			
			World's Largest Cloud Network							employees, and to rebut			
			Platforms."							Plaintiffs' claims and request			
			https://flo.health/newsroom/how-							for damages			
			flo-helps-safeguard-customer-										
			data-with-cloudflare										
0612		8/3/2022	Flo. (2022, August 3). "Flo		1		D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-		
			Achieves ISO 27001					the Flo app and to rebut Plaintiff's	defense; outside class period				
			Certification Becoming First				Scrobov; S.	claims and request for damages.	, F.1104	background about Flo and its			
			Period & Ovulation Tracker to				Schumacher			employees, and to rebut			
			Meet World-Class Security							Plaintiffs' claims and request			
			Standards."							for damages			
			https://flo.health/newsroom/flo-										
			achieves-iso-27001-certification										
0613		1/29/2024	Flo. (2024, January 29). "Flo				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-		
			Health Sets New Standards in					the Flo app and to rebut Plaintiff's	defense; outside class period				
			Female Health Tech with Dual				Scrobov; S.	claims and request for damages.	, , ,	background about Flo and its			
			ISO 27701 and ISO 27001				Schumacher			employees, and to rebut			
			Certifications."							Plaintiffs' claims and request			
			https://flo.health/newsroom/flo-							for damages			
			dual-iso-27001-certifications										
0614		4/17/2025	West, P. (2025, April 17). "Flo				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-		
			Health Appoints Cybersecurity					the Flo app and to rebut Plaintiff's	defense; outside class period				
			Leaders." Startups Magazine.				Scrobov; S.	claims and request for damages.		background about Flo and its			
			https://startupsmagazine.co.uk/in				Schumacher			employees, and to rebut			
			dex.php/article-flo-health-							Plaintiffs' claims and request			
- 1		1	The second secon	1	1	1	1		1	e	I .		

D. Gurski; R.

Scrobov; S.

Schumacher

Bugaev; L. Lydon; M. the Flo app and to rebut Plaintiff's

claims and request for damages.

0621

9/14/2022

Westman, N. and Faife, C. (2022,

September 14). "Flo period

tracker launches 'Anonymous

Mode' to fight abortion privacy

https://www.theverge.com/2022/9 /14/23351957/flo-period-tracker-

concerns." The Verge.

privacy-anonymous-mode

### Joint Preliminary Trial Exhibit List Frasco v. Flo Health, Inc., et al. (Case No. 3:21-cv-00757-JD)

Filing	tarting Bates No. Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order	tarting Bates 140.	Document Description	Designation	Sponsoring	Traintins Exhibit rui pose	Sponsoring Witness	Defendants Exhibit I ut pose	Traintins Objections	Defendants Response	Defendants Objections	Tallitins Response
Order			Designation	Witness		Sponsoring witness					
0615	1/21/2025	Flo. (2025, January 21). "Flo		** itiless		D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information		
0015	172172025	Health Appoints Cybersecurity					the Flo app and to rebut Plaintiff's	defense; outside class period			
		Leaders to Privacy & Security				Scrobov; S.	claims and request for damages.	defense, outside class period	background about Flo and its		
		Advisory Board, Reinforcing				Schumacher	ciams and request for damages.		employees, and to rebut		
		Flo's Commitment to Protecting				Schullacher			Plaintiffs' claims and request		
		Sensitive Health Data."							for damages		
		https://flo.health/newsroom/flo-							ioi damages		
		health-appoints-cybersecurity-									
		leaders									
0.64.6	101000					D 0 11 D					
0616	1/24/2023	Flo. (2023, January 24). "Flo				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or		-	
		Health appoints new executive				Bugaev; L. Lydon; M.		defense; outside class period			
		and launches Privacy & Security				Scrobov; S.	claims and request for damages.		background about Flo and its		
		Advisory Board to further its				Schumacher			employees, and to rebut		
		commitment to protecting its 50M							Plaintiffs' claims and request		
		monthly active users' data."							for damages		
		https://flo.health/newsroom/flo-									
		launches- privacy-and-security-									
		advisory-board									
0617		Screenshot of Flo app Privacy				S. Schumacher; M.		Authenticity	Relevant for information	-	
		Intent page titled, "Flo privacy				Scrobov; C.	and rebut all of Plaintiff's claims		about the Flo App,		
		explained."				Karkanias			background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0618	4/17/2025	Screenshot of Flo app pages on				S. Schumacher; M.	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant for information	-	
		April 17, 2025, beginning with				Scrobov; C.	and rebut all of Plaintiff's claims	defense; outside class period	about the Flo App,		
		the title, "You control your data."				Karkanias		•	background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0619	6/28/2021	Flo. (2021, June 28).				S. Schumacher	To establish Flo's affirmative defense	Not relevant to any claim or	Relevant for information	-	
[		"Reinforcing the Privacy and					and rebut all of Plaintiff's claims	defense; outside class period			
		Security by Design Approach				1		-, period	background about Flo and its		
		Through Collaboration with							employees, and to rebut		
		PwC."							Plaintiffs' claims and request		
		https://flo.health/security/flo-							for damages, as well as		
		collaboration- with-pwc							establishing Flo's affirmative		
		conductation with pive							defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0620	5/2/2023	PR Newswire. (2023, May 2).		+		D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information		
0020	3/2/2023	"Flo Health's "Anonymous					the Flo app and to rebut Plaintiff's	defense; outside class period		-	
		Mode" featurenamed as a finalist				Scrobov; S.	claims and request for damages.	derense, outside class period	background about Flo and its		
		in the PR Newswire."				Schumacher	ciamis and request for damages.		employees, and to rebut		
		Business Telegraph.				Schullacher			Plaintiffs' claims and request		
						1					
		https://businesstelegraph.co.uk/flo healths-anonymous-mode-feature-							for damages, as well as establishing Flo's affirmative		
									defenses and rebuttal to		
		named-as-a-finalist-in-the-pr- newswire/							plaintiffs' defenses; will be		
		iicwswife/				1					
									authenticated at trial		

To provide relevant information about Not relevant to any claim or Relevant for information

defense; outside class period about the Flo App,

background about Flo and its

Plaintiffs' claims and request

for damages, as well as establishing Flo's affirmative defenses and rebuttal to

plaintiffs' defenses; will be authenticated at trial

employees, and to rebut

Filing Starting Bates No.	Document Dat	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Sponsoring Witness		Sponsoring Witness					
0622	9/14/2022	Sorina, M. (2022, September 14).	l.			D. Gurski; R.	To provide relevant information about			-	
		"Flo's Anonymous Mode goes					the Flo app and to rebut Plaintiff's	defense; outside class period			
		live in a bid to improve data				Scrobov; S.	claims and request for damages.		background about Flo and its		
		security for millions of users."				Schumacher			employees, and to rebut		
		Fem Tech World.	,						Plaintiffs' claims and request		
		https://www.femtechworld.co.uk/ news/flos-anonymous-mode-goes-							for damages, as well as establishing Flo's affirmative		
		live-in-a-bid-to-improve-data-	-						defenses and rebuttal to		
		security-for-millions-of-users/							plaintiffs' defenses; will be		
		security for minious or asers							authenticated at trial		
0623	9/14/2022	Moon, M. (2022, September 14).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or		-	
		"Period tracker app Flo launches					the Flo app and to rebut Plaintiff's	defense; outside class period			
		'Anonymous Mode' for iOS				Scrobov; S.	claims and request for damages.		background about Flo and its		
		devices." Engadget.				Schumacher	_		employees, and to rebut		
		https://www.engadget.com/flo-							Plaintiffs' claims and request		
		anonymous-mode-is-now-							for damages, as well as		
		available-on-ios-							establishing Flo's affirmative		
		130039242.html?_fsig=4IuEsCj1							defenses and rebuttal to		
		6D7DK3yfIu53PQ~A							plaintiffs' defenses; will be		
0624	0/15/2022	1 U.G. (2022 G				D.C. L. D.	m :1 1 :: c :: 1 ::	N. 1 1.	authenticated at trial		
0624	9/15/2022	Aswell, S. (2022, September 15). "Period Tracker Flo Launches				D. Gurski; R.	To provide relevant information about			-	
		Anonymous Mode In The Wake				Bugaev; L. Lydon; M Scrobov; S.	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	about the Flo App, background about Flo and its		
		Of 'Roe V. Wade'." Scary				Schumacher	ciams and request for damages.		employees, and to rebut		
		Mommy.				Schanacher			Plaintiffs' claims and request		
		https://www.scarymommy.com/lit	f						for damages, as well as		
		estyle/period-tracker-flo-							establishing Flo's affirmative		
		anonymous-mode							defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0625	9/14/2022	Ashcraft, K. R. (2022, September	r			D. Gurski; R.	To provide relevant information about			-	
		14). Document titled, "Period					the Flo app and to rebut Plaintiff's	defense; outside class period			
		Tracker App Flo Launches First-				Scrobov; S.	claims and request for damages.		background about Flo and its		
		Ever 'Anonymous Mode' to Protect User Privacy." Jezebel.				Schumacher			employees, and to rebut Plaintiffs' claims and request		
		Flotect Osel Flivacy. Jezebei.							for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0626	9/14/2022	Inverse. (2022, September 14).				D. Gurski; R.	To provide relevant information about			-	
		"Period tracker Flo adds					the Flo app and to rebut Plaintiff's	defense; outside class period			
		'Anonymous Mode' amid data				Scrobov; S.	claims and request for damages.		background about Flo and its		
		privacy concerns."				Schumacher			employees, and to rebut		
		https://www.inverse.com/input/te ch/flo- anonymous-mode-period-							Plaintiffs' claims and request for damages, as well as		
		tracker-ios-roe-v-wade							establishing Flo's affirmative		
		lacker-103-10c-v-wade							defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0627	9/15/2022	Pifer, R. (2022, September 15).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information		
		"Period tracker Flo launches				Bugaev; L. Lydon; M	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		anonymous mode amid post-Roe				Scrobov; S.	claims and request for damages.		background about Flo and its		
		privacy concerns." Healthcare				Schumacher			employees, and to rebut		
		Dive.							Plaintiffs' claims and request		
		https://www.healthcaredive.com/							for damages, as well as		
		news/flo-anonymous-mode-period tracker-app-abortion-roe/631926/							establishing Flo's affirmative defenses and rebuttal to		
		tracker-app-abortion-roe/031920/	,						plaintiffs' defenses; will be		
									authenticated at trial		
0628	9/16/2022	Olsen, E. (2022, September 9).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or		-	
		"Period tracking app Flo releases					the Flo app and to rebut Plaintiff's	defense; outside class period			
		anonymous mode and more				Scrobov; S.	claims and request for damages.		background about Flo and its		
		digital health briefs."				Schumacher			employees, and to rebut		
		https://www.mobihealthnews.com	n						Plaintiffs' claims and request		
		/news/period-tracking-app-flo-							for damages, as well as		
		releases-anonymous-mode-and-							establishing Flo's affirmative		
		more-digital-health-briefs							defenses and rebuttal to		
									plaintiffs' defenses; will be authenticated at trial		
				1		1			audiciiticateu at triai		

Filing Order Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0629	9/14/2022	Malik, A. (2022, September 14).		withess		D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
0025	J. 1. 2022	"Period tracking app Flo rolls out					the Flo app and to rebut Plaintiff's	defense; outside class period			
		'Anonymous Mode' on iOS,				Scrobov; S.	claims and request for damages.	defense, oanstae enass perioa	background about Flo and its		
		Android launch coming next				Schumacher	ename and request for damages.		employees, and to rebut		
		month." Tech Crunch.				Sentimiener			Plaintiffs' claims and request		
		https://techcrunch.com/2022/09/1							for damages, as well as		
		4/period-tracking-app-flo-							establishing Flo's affirmative		
		anonymous-							defenses and rebuttal to		
		mode/?tpcc=tcplustwitter							plaintiffs' defenses; will be		
									authenticated at trial		
0630	9/14/2022	Kan, M. (2022, September 14).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		"Period-Tracking App Flo Adds				Bugaev; L. Lydon; M.	the Flo app and to rebut Plaintiff's	defense; outside class period			
		'Anonymous Mode' After Roe v.				Scrobov; S.	claims and request for damages.	•	background about Flo and its		
		Wade Overturn." PC Mag.				Schumacher			employees, and to rebut		
		https://uk.pcmag.com/mobile-							Plaintiffs' claims and request		
		apps/142640/period-tracking-app-							for damages, as well as		
		flo-adds-anonymous-mode-after-							establishing Flo's affirmative		
		roe-v-wade-							defenses and rebuttal to		
		overturn							plaintiffs' defenses; will be		
									authenticated at trial		
0631	9/20/2022	Burky, A. (2022, September 20).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		"Post-Dobbs data privacy law in				Bugaev; L. Lydon; M.	the Flo app and to rebut Plaintiff's	defense; outside class period			
		flux as experts, providers and				Scrobov; S.	claims and request for damages.	•	background about Flo and its		
		tech companies rethink how to				Schumacher			employees, and to rebut		
		protect patient information."							Plaintiffs' claims and request		
		Fierce Healthcare.							for damages, as well as		
		https://www.fiercehealthcare.com	ı						establishing Flo's affirmative		
		/health-tech/post-dobbs- data-							defenses and rebuttal to		
		privacy-law-flux-experts-debate-							plaintiffs' defenses; will be		
		geolocation-data-message-							authenticated at trial		
		encryption									
0632	9/15/2022	Sorina, M. (2022, September 15).				D. Gurski; R.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		"We care deeply about our users'				Bugaev; L. Lydon; M.	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		privacy, says tracking app Flo,				Scrobov; S.	claims and request for damages.		background about Flo and its		
		amid data security concerns post				Schumacher			employees, and to rebut		
		Roe v Wade." Fem Tech World.							Plaintiffs' claims and request		
		https://www.femtechworld.co.uk/							for damages, as well as		
		qa/we-care-deeply-about-our-							establishing Flo's affirmative		
		users- privacy-says-tracking-app-							defenses and rebuttal to		
		flo-amid-data-privacy-concerns-							plaintiffs' defenses; will be		
		post-roe-v-wade/							authenticated at trial		
0633	4/11/2025	App Store Story. (2025, April				D. Gurski; R.	To provide relevant information about			-	
		11). "Meet the women's health					the Flo app and to rebut Plaintiff's	defense; outside class period			
		privacy pro."				Scrobov; S.	claims and request for damages.		background about Flo and its		
		https://apps.apple.com/lt/story/id1				Schumacher			employees, and to rebut		
		694910212							Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0634	12/20/2023	Leigh, D. (2023, December 20).				D. Gurski	To provide relevant information about			-	
		"Expert Predictions For FemTech					the Flo app and to rebut Plaintiff's	defense; outside class period			
		in 2024." Techround.					claims and request for damages.		background about Flo and its		
		https://techround.co.uk/news/expe	;						employees, and to rebut		
		rt-predictions-for-femtech-in-							Plaintiffs' claims and request		
		2024/							for damages, as well as		
									establishing Flo's affirmative defenses and rebuttal to		
									plaintiffs' defenses; will be		
									plaintiffs' defenses; will be authenticated at trial		
			1	1					audicinicated at trial		

						I					
Filing Starting Bates No. Order	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Witness		Sponsoring withess					
0635	2/11/2023	Authority Magazine Editorial				S. Schumacher	To provide relevant information about			-	
		Staff. (2023, February 11). "Data					the Flo app and to rebut Plaintiff's	defense; outside class period			
		Privacy: Sue Khan of Flo Health					claims and request for damages.		background about Flo and its		
		On 5 Things You Need To Know	v						employees, and to rebut		
		To Optimize Your Company's							Plaintiffs' claims and request		
		Approach to Data Privacy."							for damages, as well as		
		Medium.							establishing Flo's affirmative		
		https://medium.com/authority-							defenses and rebuttal to		
		magazine/data-privacy-sue-khan- of-flo-health-on-5-things-you-	1-						plaintiffs' defenses; will be authenticated at trial		
		need-to-know- to-optimize-your-							authenticated at trial		
		companys-755ab35f49ca									
0636	2/16/2024	Khan, S. (2024, February 16).				S. Schumacher	To provide relevant information about	Not relevant to any claim or	Dalament for information		
0030	2/10/2024	"Here's Why Trust in Female				S. Schumacher	the Flo app and to rebut Plaintiff's	defense; outside class period		[	
		Health Technology is Critical."					claims and request for damages.	defense, outside class period	background about Flo and its		
		Information Week.					ciainis and request for damages.		employees, and to rebut		
		https://www.informationweek.co	,						Plaintiffs' claims and request		
		m/data- management/here-s-why							for damages, as well as		
		trust-in-female-health-technology							establishing Flo's affirmative		
		is-critical	´						defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0637	2/2/2024	King, C. (2024, February 2). "Fl-	lo			S. Schumacher	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Sets New Standards for Data					the Flo app and to rebut Plaintiff's	defense; outside class period			
		Protection in Health Tech."					claims and request for damages.		background about Flo and its		
		Healthcare Digital.							employees, and to rebut		
		https://healthcare-							Plaintiffs' claims and request		
		digital.com/articles/flo-sets- new							for damages, as well as		
		standards-for-data-protection-in-	-						establishing Flo's affirmative		
		health-tech							defenses and rebuttal to		
									plaintiffs' defenses; will be authenticated at trial		
0638		T. I. V. (2024 M. 20)									
0638	5/28/2024	Falco, L. (2024, May 28).				S. Schumacher; M.	To provide relevant information about			-	
		"Ensuring Data Protection In A Post-Roe World." Forbes.				Scrobov; D. Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.	defense; outside class period	background about Flo and its		
		https://www.forbes.com/sites/lisa					ciainis and request for damages.		employees, and to rebut		
		falco/2024/05/28/ensuring-data-							Plaintiffs' claims and request		
		protection-in-a-post-roe-world/							for damages, as well as		
		protection in a post rec world							establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0639	7/26/2023	Med Tech Pulse. (2023, July 26)	).			S. Schumacher; M.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		"Anoymous Mode: Femtech is				Scrobov; D. Gurski	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		Leading the Digital Health					claims and request for damages.		background about Flo and its		
		Industry in Privacy."							employees, and to rebut		
		https://www.medtechpulse.com/a	ar						Plaintiffs' claims and request		
		ticle/insight/anonymous-mode-							for damages, as well as		
		femtech-is-leading-the-digital-							establishing Flo's affirmative defenses and rebuttal to		
		health							plaintiffs' defenses; will be		
									authenticated at trial		
0640		Document titled, "Privacy Team	+	1		S. Schumacher	To provide relevant information about	Authenticity	Relevant for information	_	
		Bios."				S. Senanathti	the Flo app and to rebut Plaintiff's	. Immonitionly	about the Flo App,		
							claims and request for damages.		background about Flo and its		
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
	1	1							authenticated at trial		

Filing Order Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0641	3/28/2023	Bryant, J. (2023, March 28). "Flo's Khan: Building a better future for female health is a 'privilege." IAPP. https://iapp.org/news/a/flos-khan- building-a- better-future-for- female-health-is-a-privilege/				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0642	9/21/2023	Minsky, C. (2023, September 21). "Consumer groups put more value on security." The Financial Times. https://www.ft.com/content/93f23 e86-7103-4b3e-88a6- af61280588e8				S. Schumacher	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
0643 FLO-00001104		Document titled, "Data Processing Admendment to G Suite and/or Complementary Product Agreement (Version 2.1)."				For cross examination and/or to provide relevant context during expert examinations	Named Plainitffs; Plaintiffs' Experts; C. Karkanias	Not relevant to any claim or defense		-	
0644 FLO-00001120		Document titled, "G Suite (Online) Agreement."					Named Plainitffs; Plaintiffs' Experts; C. Karkanias	Not relevant to any claim or defense		-	
0645 FLO-00001387	6/20/2019	Fabric Data Processing and Security Terms, dated June 20, 2019.				For cross examination and/or to provide relevant context during expert examinations	Named Plainitffs; Plaintiffs' Experts; C. Karkanias	Not relevant to any claim or defense		-	
0646 FLO-00001408	1/27/2017	Fabric Software and Services Agreement, dated January 27, 2017.					Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
0647 FLO-00001422		Facebook webpage titled, "Data Processing Terms."				and/or to provide relevant context during expert examinations	n Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
0648 FLO-00001423		Facebook webpage titled, "Terms of Service."	S			For cross examination and/or to provide relevant context during expert examinations	n Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
0649 FLO-00001462		Document titled, "Data Processing Amendment to the Google Analytics Agreement."				For cross examination and/or to provide relevant context during expert examinations	Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
0650 FLO-00001469		Document titled, "Google Analytics Terms of Service."				For cross examination	Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
0651 FLO-00001483	6/20/2019	Webpage titled, "Firebase Data Processing and Security Terms," dated June 20, 2019.					Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
0652 FLO-00001506	7/31/2019	Document titled, "Firebase Paid Services Terms of Service."					Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	

Filing Starting Bates No.	Document D	ate Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order Starting Bates No.	Document Da	tte Document Description	Designation	Sponsoring	Traintins Exhibit rui pose	Sponsoring Witness	Defendants Exhibit I di pose	Tiantins Objections	Defendants Response	Defendants Objections	1 families Response
				Witness							
0653 FLO-00001533		Document titled, "Data					Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
		Processing Addendum," from the AppsFlyer Terms of Use.	e			and/or to provide relevant context	Karkanias				
		Appsriyer remis or ose.				during expert					
						examinations					
0654 FLO-00001549	5/25/2018	Facebook webpage titled,					Named Plainitffs; Plaintiffs' Experts; C.			-	
		"Custom Audiences Terms."				and/or to provide	Karkanias				
						relevant context during expert					
						examinations					
0655 FLO-00001550		Facebook webpage titled, "Data					Named Plainitffs; Plaintiffs' Experts; C.			-	
		Processing Terms."				and/or to provide	Karkanias				
						relevant context					
						during expert					
0656 FLO-00001551		Facebook webpage titled, "Term				examinations	Named Plainitffs; Plaintiffs' Experts; C.				
0030 120-00001331		of Service."	is			and/or to provide	Karkanias				
						relevant context					
						during expert					
						examinations					
0657 FLO-00001572	10/12/2017	Google webpage titled, "Google Ads Data Processing Terms."				For cross examination and/or to provide	Named Plainitffs; Plaintiffs' Experts; C. Karkanias			-	
		Ads Data Processing Terms.				relevant context	Karkanias				
						during expert					
						examinations					
0658 FLO-00001597	11/1/2016	Google webpage titled, "Google	:				Named Plainitffs; Plaintiffs' Experts; C.			-	
		Ads Terms & Conditions."				and/or to provide	Karkanias				
						relevant context during expert					
						examinations					
0659 FLO-00002362	6/22/2018	Flo Terms of Use dated June 22,	,							-	
		2018.									
0660		Flo Health - Let's Talk About It								-	
0661 FLO-00002823	3/27/2019	Campaign Flo's privacy policy, dated March	la la								
120-0002025	3/2//2019	27, 2019.									
0662	0/0/2019	Screenshot of Dmitry Gurski				D. Gurski	To provide relevant background during	Not relevant to any claim or		-	
		LinkedIn Post regarding Flo's					direct examination	defense	about the Flo App,		
		Christmas party - Publicly Available							background about Flo and its		
		Available							employees, and to rebut Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
0663	12/0/2024	Committee Combi				D. Gurski	To associate advantable description	N-+	authenticated at trial		
0003	12/0/2024	Screenshot of Dmitry Gurski LinkedIn Post regarding				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	about the Flo App,	-	
		PICCASO Awards Europe -					an eet examination	desemb	background about Flo and its		
		Publicly Available							employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0664	12/0/2024	Screenshot of Dmitry Gurski				D. Gurski	To provide relevant background during		Relevant for information	-	
		LinkedIn Post regarding Flo team	n				direct examination	defense	about the Flo App,		
		reaching 500 employees -							background about Flo and its		
		Publicly Available							employees, and to rebut Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		

Filine	Starting Bates No.	Document Det	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
Orde		Document Dat	Document Description	Designation	Sponsoring	Framulis Exhibit Furpose	Sponsoring Witness	Defendants Exhibit Furpose	Fiantins Objections	Detenuants Response	Defendants Objections	riamitiis Kesponse	
0665		0/0/2022	Screenshot of Dmitry Gurski		Witness		D. Gurski	To provide relevant background during	Not relevant to any claim or	Relevant for information	-		
			LinkedIn Post regarding Flotilla					direct examination	defense	about the Flo App,			
			for Peace and Freedom for people							background about Flo and its			
			of Ukraine - Publicly Available							employees, and to rebut			
										Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to			
										plaintiffs' defenses; will be authenticated at trial			
0.000		0/0/0000					D 0 11						
0666		0/0/2020	Screenshot of Dmitry Gurski				D. Gurski	To provide relevant background during			-		
			LinkedIn Post regarding Flo Presentation to Mike Pompeo -					direct examination	defense	about the Flo App, background about Flo and its			
			Publicly Available							employees, and to rebut			
			I ubility Available							Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to			
										plaintiffs' defenses; will be			
										authenticated at trial			
0667		0/0/2020	Screenshot of Dmitry Gurski				D. Gurski	To provide relevant background during			-		
			LinkedIn Post regarding United					direct examination	defense	about the Flo App,			
			Nations Population Fund -							background about Flo and its			
			Publicly Available							employees, and to rebut			
										Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to plaintiffs' defenses; will be			
										authenticated at trial			
0668		0/0/2020	Screenshot of Dmitry Gurski				D. Gurski	To provide relevant background during	Not relevant to any claim on				
0008		0/0/2020	LinkedIn Post regarding				D. Guiski	direct examination	defense	about the Flo App,			
			Presenting for United					direct examination	delense	background about Flo and its			
			Nations Population Fund -							employees, and to rebut			
			Publicly Available							Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to			
										plaintiffs' defenses; will be			
										authenticated at trial			
0669		0/0/2020	Dmitry Gurski LinkedIn photo				D. Gurski	To provide relevant background during			-		
			with Dmitry Gurski and Natalia					direct examination	defense	about the Flo App,			
			Kanem of the UNFPA - Publicly							background about Flo and its			
			Available							employees, and to rebut Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to			
										plaintiffs' defenses; will be			
										authenticated at trial			
0670		0/0/2020	Dmitry Gurski LinkedIn photo				D. Gurski	To provide relevant background during	Not relevant to any claim or		-		
			with Dmitry Gurski and Natalia					direct examination	defense	about the Flo App,			
			Kanem holding shirt - Publicly							background about Flo and its			
			Available							employees, and to rebut			
										Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to			
										plaintiffs' defenses; will be authenticated at trial			
0671		0/0/2020	Dmitry Gurski LinkedIn photo				D. Gurski	To provide relevant background during	Not soloriout to our ol-i			+	
00/1		0/0/2020	with Dmitry Gurski Linkedin photo				D. GUISKI	direct examination	Not relevant to any claim or defense	about the Flo App,	[-		
			Kanem walking - Publicly					direct examination	uciciisc	background about Flo and its			
			Available							employees, and to rebut			
			11.andote							Plaintiffs' claims and request			
										for damages, as well as			
										establishing Flo's affirmative			
										defenses and rebuttal to			
										plaintiffs' defenses; will be			
L			<u> </u>		<u>                                     </u>			<u> </u>	<u> </u>	authenticated at trial			 

Filing Starting Bates No. Order	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0672	0/0/2020	Dmitry Gurski LinkedIn photo with Dmitry Gurski and Natalia Kanem in hallway Publicly Available		witness		D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request	-	
0673	0/0/2020	Dmitry Gurski LinkedIn photo of				D. Gurski	To provide relevant background during	Not relevant to any claim or	for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial Relevant for information	-	
		Natalia Kanem - Publicly Available					direct examination	defense	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0674	0/0/2020	Dmitry Gurski LinkedIn photo of Natalia Kanem in hallway - Publicly Available				D. Gurski	To provide relevant background during direct examination	defense	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0675	0/0/2020	Dmitry Gurski LinkedIn photo of Presenting for United Nations Population Fund - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0676	0/0/2020	Dmitry Gurski LinkedIn photo of Natalia Kanem shaking hands - Publicly Available				D. Gurski	To provide relevant background during direct examination	defense	about the Flo App, background about Flo and its employees, and to rebut Plainitifs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0677	0/0/2020	Dmitry Gurski LinkedIn photo of Dmitry Gurski and Natalia Kanem talking - Publicly Available				D. Gurski	To provide relevant background during direct examination	defense	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
0678	0/0/2020	Dmitry Gurski LinkedIn photo of Dmitry Gurski and Natalia Kanem in front of screen - Publicly Available				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiff's defenses; will be authenticated at trial	-	

	Joint Preliminary Trial Exhibit List	
Fras	o v. Flo Health, Inc., et al. (Case No. 3:21-cv-00	757-JD)

Filing	Starting Bates No.	Document Date	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections Plaintiffs' Response
Order	Starting Dates 140.	Document Date	Document Description	Designation	Sponsoring	Traintins Exhibit Ful pose	Sponsoring Witness	Defendants Exhibit I ut pose	Traintins Objections	Defendants Response	Peterdants Objections   Families Response
					Witness						
0679			Photo of Dmitry Gurski holding photo books				D. Gurski	To provide relevant background during direct examination	Not relevant to any claim or defense	Relevant for information about the Flo App,	
			photo books					direct examination	defense	background about Flo and its	
										employees, and to rebut	
										Plaintiffs' claims and request	
										for damages, as well as	
										establishing Flo's affirmative	
										defenses and rebuttal to	
										plaintiffs' defenses; will be	
										authenticated at trial	
0680		0/0/2020	Screenshot of Dmitry Gurski				D. Gurski	To provide relevant background during	Not relevant to any claim or	Relevant for information	-
			LinkedIn Post regarding opening	3				direct examination	defense	about the Flo App,	
			STEM center in Belarus -							background about Flo and its	
			Publicly Available							employees, and to rebut	
										Plaintiffs' claims and request	
										for damages, as well as	
										establishing Flo's affirmative	
										defenses and rebuttal to	
										plaintiffs' defenses; will be	
										authenticated at trial	
0681	FLO-00003350		F.A.Q How to Sync Flo with				A. Klepchukova	To provide relevant information about			-
			Fitness Trackers and Health					the Flo app and to rebut Plaintiff's			
			Apps.pdf					claims and request for damages.			
0682	FLO-00003353		App FAQs.jpeg				A. Klepchukova	To provide relevant information about			[-
								the Flo app and to rebut Plaintiff's			
0.002	ET 0 00002254		EAG A D D				0.01	claims and request for damages.			
0683	FLO-00003354		F.A.Q Account, Data Restore				S. Schumacher	To provide relevant information about			
			and Sharing.pdf					the Flo app and to rebut Plaintiff's claims and request for damages.			
0684	FLO-00003357		Org Chart 01.01.22.pdf					ciaims and request for damages.			
0684	FLO-00003357 FLO-00003358		Org Chart 01.01.22.pdf Org Chart 30.09.2021.pdf								
	FLO-00003363		F.A.Q Technical Issues				D. Dugogra I. Lydon.	To provide relevant information about			
0080	FLO-00003303		Reminders, Battery Usage,				M. Scrobov	the Flo app and to rebut Plaintiff's			
			Notifications.pdf				IVI. SCIODOV	claims and request for damages.			
0687	FLO-00003367		Current Org Chart.png				D. Gurski	To provide relevant information about			
0007	110-00003307		Current Org Chart.ping				D. Guiski	the Flo app and to rebut Plaintiff's			
								claims and request for damages.			
0688	FLO-00003425		Facebook - Lookalike terms.pdf				R. Bugaev; M.	To provide relevant information about			-
0000	1 EO-00003423		r deebook - Lookanke ternis.pur					the Flo app and to rebut Plaintiff's			
							Karkanias	claims and request for damages.			
0689	FLO-00003452		Data Processing Amendment to	G			R. Bugaev; M.	To provide relevant information about			_
			Suite.pdf				Scrobov; C.	the Flo app and to rebut Plaintiff's			
			*				Karkanias	claims and request for damages.			
0690	FLO-00003492		Facebook Data Processing Term	ns			R. Bugaev; M.	To provide relevant information about			-
			.pdf				Scrobov; C.	the Flo app and to rebut Plaintiff's			
							Karkanias	claims and request for damages.			
0691	FLO-00003677		Google Ads Terms Conditions	-			R. Bugaev; M.	To provide relevant information about			-
			Advertising Policies Help.docx				Scrobov; C.	the Flo app and to rebut Plaintiff's			
							Karkanias	claims and request for damages.			
0692	FLO-00003704		Google Ads Terms _ Conditions	-			R. Bugaev; M.	To provide relevant information about			-
			Advertising Policies Help.pdf				Scrobov; C.	the Flo app and to rebut Plaintiff's			
							Karkanias	claims and request for damages.			
0693	FLO-00003721		Facebook general terms of				R. Bugaev; M.	To provide relevant information about			-
			service.pdf				Scrobov; C.	the Flo app and to rebut Plaintiff's			
							Karkanias	claims and request for damages.			
0694	FLO-00003788		G Suite Terms of Service – G				R. Bugaev; M.	To provide relevant information about			-
			Suite.pdf				Scrobov; C.	the Flo app and to rebut Plaintiff's			
			-				Karkanias	claims and request for damages.			
0695	FLO-00004108		Google Ads Data Processing				R. Bugaev; M.	To provide relevant information about			-
			Terms.pdf				Scrobov; C.	the Flo app and to rebut Plaintiff's			
					1		Karkanias	claims and request for damages.			
0696	FLO-00067081		android_1.jpg				R. Bugaev; M.	To provide relevant information about			-
								the Flo app and to rebut Plaintiff's			
0.50-	TIT O OCCUPACE		1 11 01		1		Karkanias	claims and request for damages.			
0697	FLO-00067082		android_2.jpg				R. Bugaev; M.	To provide relevant information about			<u> </u>
								the Flo app and to rebut Plaintiff's			
0.000	ET 0 000 (7002		iog 1 mig				Karkanias	claims and request for damages.			
0698	FLO-00067083		iOS_1.PNG				R. Bugaev; M.	To provide relevant information about			
							Scrobov; L. Lydon; C. Karkanias	the Flo app and to rebut Plaintiff's claims and request for damages.			
		<u> </u>	+		1		rankamas	cianns and request for damages.	1	1	4

Filing	Starting Bates No.	Document Date Document Descri	iption Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order	Starting Dates 110.	Document Date Document Descri	Designation	Sponsoring	Traintins Exhibit rui post	Sponsoring Witness		riaments Objections	Detendants Response	Detenuants Objections	ramuns response
				Witness							
0699	FLO-00067084	iOS_2.PNG				R. Bugaev; M. Scrobov; L. Lydon; O	To provide relevant information about the Flo app and to rebut Plaintiff's			-	
						Karkanias	claims and request for damages.				
0700	FLO-00067872	Flo.pdf				R. Bugaev; M.	To provide relevant information about			-	
						Scrobov; L. Lydon; O					
0.004	TT 0 000 (0 101	2 1 2010	07.00.45.05			Karkanias	claims and request for damages.				
0701	FLO-00068491	Screenshot_2019-0	06-28-17-35-			R. Bugaev; M. Scrobov; L. Lydon; O	To provide relevant information about the Flo app and to rebut Plaintiff's			-	
		553_org.iggymedia	a.periodtracker.			Karkanias	claims and request for damages.				
		png					1 3				
0702	FLO-00068492	Screenshot_2019-0	06-28-17-36-			R. Bugaev; M.	To provide relevant information about			-	
		37-				Scrobov; L. Lydon; C					
		192_com.google.ar	ndroid.gms.png			Karkanias	claims and request for damages.				
0703	FLO-00068493	Screenshot 2019-0	06-28-17-35-			R. Bugaev; M.	To provide relevant information about			-	
		54-				Scrobov; L. Lydon; O					
		432_com.google.ar	ndroid.gms.png			Karkanias	claims and request for damages.				
0.004	TY 0 000 TA 2 TA	77. 10				D D 16					
0704	FLO-00071351	Flo.pdf				R. Bugaev; M. Scrobov; L. Lydon;	To provide relevant information about the Flo app and to rebut Plaintiff's			-	
						D. Gurski	claims and request for damages.				
0705	FLO-00071758	Brand Health, Usa	ige & Attitude			R. Bugaev; M.	To provide relevant information about			-	
		study January 2020	0 (1) (1).pdf			Scrobov; L. Lydon;	the Flo app and to rebut Plaintiff's				
0.000	TV 0 00004400	71. 0	W 11 X 44			D. Gurski	claims and request for damages.				
0706	FLO-00071778	Flo_Stage Deck_ a compressed.pdf	all slides_Jan23-			R. Bugaev; M. Scrobov; L. Lydon;	To provide relevant information about the Flo app and to rebut Plaintiff's			-	
		compressed.pdf				D. Gurski	claims and request for damages.				
0707	FLO-00072578	IMG 0259.PNG				R. Bugaev; M.	To provide relevant information about			-	
						Scrobov; L. Lydon;	the Flo app and to rebut Plaintiff's				
						D. Gurski	claims and request for damages.				
0708	FLO-00076578	Flo Brand Survey	Results.pdf			R. Bugaev; M.	To provide relevant information about			-	
						Scrobov; L. Lydon; D. Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.				
0709	FLO-00093873	Brand Internal Fel	burary			R. Bugaev; M.	To provide relevant information about			_	
0,05	120 000,3073	2021_Final (2) (1)				Scrobov; L. Lydon;	the Flo app and to rebut Plaintiff's				
						D. Gurski	claims and request for damages.				
0710	FLO-00093901	External Brand Per				R. Bugaev; M.	To provide relevant information about			-	
		Survey_May 2020 (1).pdf	_FINAL (1)			Scrobov; L. Lydon; D. Gurski	the Flo app and to rebut Plaintiff's claims and request for damages.				
0711	FLO-00095139	(1).pdi Flo 09 17.pdf				R. Bugaev; M.	To provide relevant information about			_	
0711	120-000/313/	110_05_17.pdf				Scrobov; L. Lydon;	the Flo app and to rebut Plaintiff's				
						D. Gurski	claims and request for damages.				
0712	FLO-00098187	Copy of Flo Interna				R. Bugaev; M.	To provide relevant information about			-	
		User Attitude Pres	.pptx			Scrobov; L. Lydon;	the Flo app and to rebut Plaintiff's				
0713	FLO-00101945	Flo - statistics for l	Dover vlev			D. Gurski R. Bugaev; M.	claims and request for damages.  To provide relevant information about				
3/13	110-00101945	1 10 - Statistics for i	Dayot.AlbA			Scrobov; L. Lydon	the Flo app and to rebut Plaintiff's				
L						,,	claims and request for damages.				
0714	FLO-00104923	Transformation tab				R. Bugaev; M.	To provide relevant information about			-	
		2020 25-5-2021.xl	lsx			Scrobov; L. Lydon	the Flo app and to rebut Plaintiff's				
0715	FLO-00105144	11/14/2018 Contract for Spons	corchin of			T Orlove: P Dusses	claims and request for damages.  v; To provide relevant information about			_	
0/13	120-00103144	Contraceptive Edu				M. Scrobov	the Flo app and to rebut Plaintiff's				
		Bayer AG and Flo					claims and request for damages.				
		between Bayer AG									
		Health, Inc., dated	November 13,								
0716		2018. 0/0/2020 Dmitry Gurski Lin	skadin nhoto			D. Gurski	To provide background on direction	Not relevant to any claim or	Dalayant for information		
0/10		regarding opening				D. Guiski	examination regarding Flo	defense	about the Flo App,		
		in Belarus - Public							background about Flo and its	;	
									employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
L									authenticated at trial		
		•									

Order Designation Sponsoring Sponsoring Witness	s' Response Defendants' Objections Plaintiffs' Response
Witness	
0717 0/0/2020 Screenshot of Dmitry Gurski D. Gurski To provide background on direction Examination regarding Flo defense about the Flo Ap	
Linkeuin rost regarrung tearus cxamination regarrung rio detense about ine rio At STEM center with group gathered background abo	to App., about Flo and its
around tech - Publicly Available employees, and	
Plaintiffs' claims	laims and request
for damages, as	
establishing Flo	Flo's affirmative
defenses and ret	
planutris cetens authenticated at	
0/18 0/0/2020 Dmitry Gurski LinkedIn Photo D. Gurski To provide background on direction Not relevant to any claim or Relevant for info	
10/10/20/20 Dimity Ourse Linearin Finou Provide Seagnful of uncertain 10 in Section 10	
	about Flo and its
Publicly Available employees, and	and to rebut
Plaintiffs' claims	laims and request
for damages, as	
establissang Flo destabissand ref	Flo's affirmative
defenses and ret	
piamuta cerens authenticated at	
0719 0/0/2020 Screenshot of Dmitry Gurski D. Gurski To provide background on direction Not relevant to any claim or Relevant for infinity.	
Section of Diliny Guissa   District Topology Guissa   District Topology Guissa   District Topology Guissa   Not recently Carlot and Carly Cannot on the Carlot Topology Guissa   Not recently Carlot Topology Guissa   Not r	
STEM center background abo	about Flo and its
holding up cut ribbon - Publicly employees, and	and to rebut
Available Plaintiffs' claims	laims and request
for damages, as	
establishan pl'o destabishan pl'o	Flo's affirmative
defenses and ret	
panulis declar authenticated at	
0720 0/0/2020 Dmitry Gurski LinkedIn Photo D. Gurski To provide background on direction Not relevant to any claim or Relevant for infinity.	
regarding Belarus STEM center examination regarding Flo defense about the Flo Ag	
holding up cut ribbon - Publicty background abo	about Flo and its
Available employees, and	
	laims and request
for damages, as	
estabisnes ario destabisnes and ret	Flo's affirmative
decreases and rec	
authenticated at	
0721 0/0/2020 Screenshot of Dmitry Gurski D. Gurski To provide background on direction Not relevant to any claim or Relevant for inf	r information -
LinkedIn Post regarding Belarus examination regarding Flo defense about the Flo Ap	lo App,
	about Flo and its
STEAM sign - Publicly employees, and	
	laims and request
for damages, as	s, as well as Flo's affirmative
estatissang rio destatissang rio	d rebutal to
plaintiffs' defen	
authenticated at	
0702 07020 Dmitry Gurski LinkedIn Photo D. Gurski To provide background on direction Not relevant to any claim or Relevant for info	
regarding Belarus STEM center examination regarding Flo defense about the Flo Ap	ю Арр,
STEAM sign - Publicly background abo	about Flo and its
Available employees, and	and to rebut
Plaintifis' claims for damages, as	laims and request
Ior damages   E	s, as well as [Flo's affirmative
defenses and ret	
plaintiffs' defens	efenses; will be
authenticated at	
0723 0/0/2020 Screenshot of Dmitry Gurski D. Gurski To provide background on direction Not relevant to any claim or Relevant for infi	r information -
LinkedIn Post regarding Belarus examination regarding Flo defense about the Flo Ar	
	about Flo and its
Publicly Available employees, and the property of the property	and to rebut laims and request
Plantifungers for the first form of the first fo	
establishine Fle	, do with an analysis of the state of the st
defenses and reb	d rebuttal to
plaintiffs' defens	
authenticated at	d at trial

Filing Order Starting Bates No.	Document Dat	e Document Description Confider Designa	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0724	0/0/2020	Dmitry Gurski LinkedIn Photo regarding Belarus STEM center STEAM room - Publicly Available		D. Gurski	To provide background on direction examination regarding Flo	Not relevant to any claim or defense	about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to	-	
0725 n/a	5/2/2024	42matters, "Mobile SDKs n/a		C. Karkanias; G.	Foundation for Expert Opinion;	Authenticity	plaintiffs' defenses; will be authenticated at trial Relevant as foundation for	-	
	(accessed)	Explorer from 42matters   updated May 2024," https://42matters.com/sdks, accessed May 2, 2024		Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation		Mr. Karkanias's expert opinion		
0726	0/0/2006	Hinton, G. and Osindero, S. (2006). "A fast learning algorithm for deep belief nets." - Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0727	0/0/2017	Lundberg, S. and Lee, S. (2017). "A Unified Approach to Interpreting Model Predictions." 31st Conference on Neural Information Processing Systems Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0728	3/15/2023	Social media post by AppCensus dated March 15, 2023 - Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0729	0/0/2017	Vaswani, A. et al. (2017). "Attention Is All You Need." 31st Conference on Neural Information Processing Systems Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0730	12/23/2020	Document titled, "What Is an SDK?", dated December 23, 2020 Publicly Available		C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	
0731	8/21/2014	Sunyaev, A. et al. (2014, August 21). "Availability and quality of mobile health app privacy policies." J Am Med Inform Assoc Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0732	5/24/2019	Devlin, J. et al. (2019, May 24). "BERT: Pre-training of Deep Bidirectional Transformers for Language Understanding." - Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0733	1/0/1995	Lecun, Y. and Bengio, Y. (January 1995). "Convolutional Networks for Images, Speech, and Time-Series." - Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0734	10/13/2014	Schmidhuber, J. (2014, October 13). "Deep learning in neural networks: An overview." Elsevier Ltd Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0735	5/0/2015	LeCun, Y., Bengio, Y., and Hinton, G. (May 2015). "Deep Learning." Nature, 521(7553), 436-444 Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0736	2/2/2017	Esteva, A. et al. (2017, February 2). "Dermatologist-level classification of skin cancer with deep neural networks." Nature, 542 (7639): 115–118. doi:10.1038/nature21056 Publicly Available		C. Karkanias	Foundation for Expert Opinion			-	
0737		Webpage titled, "StoreKit 2." - Publicly Available		C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert opinion	-	

Filing Starting Bates No. Order	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
0738	6/0/2020	Raffel, C. et al. (June 2020). "Exploring the Limits of Transfer		WEICS		C. Karkanias	Foundation for Expert Opinion			-		
		Learning with a Unified Text-to- Text Transformer." Journal of Machine Learning Research 21										
0739		(2020) Publicly Available Webpage from				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for			
0/39		support.google.com titled, "Ads."				C. Karkamas	Foundation for Expert Opinion	Aumenticity	Mr. Karkanias's expert opinion			
0740		Radford, A. et al. "Improving Language Understanding by Generative Pre- Training." Publicly Available				C. Karkanias	Foundation for Expert Opinion			-		
0741	7/22/2020	Brown, T. et al. (2020, July 22). "Language Models are Few-Shot Learners." - Publicly Available				C. Karkanias	Foundation for Expert Opinion	-		-		
0742	7/17/2015	Jordan, M.I., and Mitchell, T.M. (2015, July 17). "Machine				C. Karkanias	Foundation for Expert Opinion	-		-		
		learning: Trends, perspectives, and prospects." Science Mag, 349 (6245), 255-260.										
0743		Webpage from developers.facebook.com titled, "Advertiser Tracking Enabled."				C. Karkanias	Foundation for Expert Opinion	Authenticity		-		
0744		Webpage from developers.facebook.com titled, "FAQ."				C. Karkanias	Foundation for Expert Opinion	Authenticity		-		
0745	4/12/2021	Piktus, A. et al. (2021, April 12). "Retrieval-Augmented Generation for Knowledge- Intensive NLP Tasks."				C. Karkanias	Foundation for Expert Opinion	-		-		
0746 n/a	1/26/2023	Koetsier, John, "5 billion ad events show that fewer than 1% of Android users opt out of personalized ads," Singular,	n/a			C. Karkanias; G. Zervas	Foundation for Expert Opinion; Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-		
		https://www.singular.net/blog/adp ersonalization-android/, accessed May 23, 2024										
0747	4/0/2018	Bzdok, D., Altman, N. and Krzywinski, M. (April 2018). "Statistics versus machine learning." Nat Methods. 2018 April; 15(4): 233–234. doi:10.1038/mmeth.4642.				C. Karkanias	Foundation for Expert Opinion	-		-		
0748	9/22/2019	Rudin, C. (2019, September 22). "Stop Explaining Black Box Machine Learning Models for High Stakes Decisions and Use				C. Karkanias	Foundation for Expert Opinion	-		-		
0749		Interpretable Models Instead."  Graves, A. "Supervised Sequence Labelling with ccurrent Neural				C. Karkanias	Foundation for Expert Opinion	-		-		
0750	5/23/2018	Networks." Howard, J., and Ruder, S. (2018, May 23). "Universal Language Model Fine- tuning for Text Classification."				C. Karkanias	Foundation for Expert Opinion	-		-		
0751		Webpage on appcensus.io titled, "Unlock unparalleled insight into your mobile app privacy."				C. Karkanias	Foundation for Expert Opinion			-		
0752		Webpage on charles.proxy.com titled, "Web Debugging Prox Application for Windows, Mac				C. Karkanias	Foundation for Expert Opinion			-		
0753		OS and Linux."  Webpage on web.archive.org titled, "Custom Events with Flurry Analytics for iOS."				C. Karkanias	Foundation for Expert Opinion			-		
0754		Webpage on web.archive.org titled, "Custom Events with Flurry Analytics for iOS."				C. Karkanias	Foundation for Expert Opinion			-		

Filing Starting Bates No.	Document Dat	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Sponsoring Witness		Sponsoring Witness					
0755	2/9/2021	Moshlegh, L., et al. (2021,				C. Karkanias	Foundation for Expert Opinion			-	
		February 9). "Flurry 2021 State of Mobile."									
0756	6/28/2024	Expert Rebuttal Report by Chris D. Karkanias, dated June 28,				C. Karkanias	Foundation for Expert Opinion			-	
		2024.									
0757	5/3/2024	Expert Report by Chris D. Karkanias, dated May 3, 2024.				C. Karkanias	Foundation for Expert Opinion			-	
0758		Webpage on mitmproxy.org				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for	-	
		titled, "mitmproxy is a free and open source interactive HTTPS							Mr. Karkanias's expert opinion		
		proxy."									
0759		Webpage on sideloadly.io titled, "Sideloadly: The Ultimate iOS				C. Karkanias	Foundation for Expert Opinion	Authenticity	Relevant as foundation for Mr. Karkanias's expert	-	
		Sideloading Tool."							opinion		
0760		Flo Health Cooperation Agreement with EBCOG -				<ul> <li>A. Klepchukova; D. Gurski</li> </ul>	To provide relevant information about the Flo app and to rebut Plaintiff's	Authenticity	Relevant for information about the Flo App,	-	
		Publicly Available					claims and request for damages.		background about Flo and its		
									employees, and to rebut Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative defenses and rebuttal to		
									plaintiffs' defenses; will be		
0761		Flo Health Articles Sponsored by	v			A. Klepchukova; D.	To provide relevant information about	Authenticity	authenticated at trial Relevant for information	-	
		EBCOG - Publicly Available	,			Gurski	the Flo app and to rebut Plaintiff's		about the Flo App,		
							claims and request for damages.		background about Flo and its employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be authenticated at trial		
0762 n/a	2016	Goodfellow, Ian, Yoshua Bengio	o, n/a			G. Zervas	Relevant to Absence of Eavesdropping,	Authenticity		-	
		and Aaron Courville, Deep Learning, MIT Press,					Explain Operation of the Technologies, Expert Foundation				
		https://www.deeplearningbook.or	r								
0763	0/0/2018	Sejnowski, T. J. (2018). The dee	p			C. Karkanias	Foundation for Expert Opinion			-	
		learning revolution. MIT press. https://mitpress.mit.edu/books/de	ee								
		p-learning-revolution									
0764 FLURRY_FRASCO_000		Document titled, "Events for				R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to			-	
011 0765 FLURRY FRASCO 000		Flurry Analytics."  Document titled, "Event				D Duggay: I Lydon	explain the operation of the Flo app  To rebut Plaintiff's claims and to				
030		Parameter Distribution."					explain the operation of the Flo app				
0766 FLURRY_FRASCO_000 163		Document from Yahoo Develope Network titled, "Features."	er			R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
		, i									
0767 FLURRY_FRASCO_000 176		Document from Yahoo Develope Network titled, "Breakouts."	er			R. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
OSCO PLINESS PROCESS		, i				B B					
0768 FLURRY_FRASCO_000 179		Document from Yahoo Develope Network titled, "Custom	er .			K. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0769 FLURRY FRASCO 001	1	Dashboards."				D. Derrom I. I. J.					
010 PLUKKY_FRASCO_001		Document from dev.flurry.com titled, "Company Activity				K. Bugaev; L. Lydon	To rebut Plaintiff's claims and to explain the operation of the Flo app			-	
0770 META-FRASCO-	Varied	Dashboard."  Meta, Flo Analytics Dashboard	HC AEO			T. Wooldridge; A.	Relevant to Absence of Eavesdropping				
0000002258	v al ICU	Aug. 12, 2019 - Aug 11, 2021				Lapitski; Flo Witness					
0771		Terms of Service with OwHealth Inc., for use of the Flo mobile	1,			S. Schumacher; M. Scrobov; C.	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity	Will provide bates-stamped image during exchange	-	
		application.				Karkanias			process		
0772		Screenshot of Terms of Service with OwHealth, Inc., for use of				S. Schumacher; M. Scrobov; C.	To establish Flo's affirmative defense and rebut all of Plaintiff's claims			-	
		the Flo mobile application.				Karkanias	and reout an or radium s claims				
	-	-			-		-		-	-	

Fi O	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
07	73 FLO-00105158	11/2/2018	Document titled, "Agreement for the Cooperation for a Disease Awareness Project in Brazil including use of a Virtual Assistant," between Bayer AG and Flo Health, Inc., dated November 2, 2018.				T. Orlova	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Not relevant to any claim or defense	Relevant to the extent Flo loses its MIL re P&G and Bayer	-	
07	74 FLO-00105127	7/24/2018	Document titled, "Advertising Services Agreement," between OwHealth, Inc. and Procter & Gamble, dated July 24, 2018.				T. Orlova; R. Bugaev; M. Scrobov	To establish Flo's affirmative defense and rebut all of Plaintiff's claims			-	
07	75	2/16/2018	UNFPA. (2018, February 16). UNFPA partners with Flo app to bring reproductive health inforrmation to millions of users. Https://www.unfpa.org/updates/u nfpa- partners-flo-app-bring- reproductive-health-information- millions-users				A. Klepchukova; D. Gurski	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Not relevant to any claim or defense	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
07	76	5/5/2025	Max Scrobov's LinkedIn profile page.				M. Scrobov	As relevant background for Mr. Scrobov's examination	Not relevant to any claim or defense	Relevant to establishing background and credential of M. Scrabo	-	
07	77	2/17/2023	Grande, A. (2023, February 17). Cybersecurity & Privacy Group of the Year: Dechert. Law360.				M. Scrobov	As relevant background for Mr. Scrobov's examination	Not relevant to any claim or defense; outside class period	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial	-	
07	78	3/16/2022	Flo. (2022, March 16). Flo Health Inc. company update, March 2022. https://flo.health/newsroom/flo- company-update				D. Gurski; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaintiff's claims and request for damages.	Not relevant to any claim or defense; outside class period		-	
07	79	6/30/2022	Flo. (2022, June 30). Flo, the leading female health app, launches 'Anonymous Mode' to further protect reproductive health information in wake of Roe v. Wade decision. https://flo.health/newsroom/flo- launches-anonymous-mode				D. Gurski; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaimitif's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information	-	
07	80	3/8/2022	Flo. (2022, March 8). Supporting our Flo community in Ukraine. https://flo.health/newsroom/flo- ukraine-support				D. Gurski; A. Klepchukova; T. Orlova; M. Scrobov	To provide relevant information about the Flo app and to rebut Plaimtiff's claims and request for damages.	Not relevant to any claim or defense; outside class period	Relevant for information	-	

Filing Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order			Designation	Sponsoring Witness		Sponsoring Witness					
0781		Flo webpage titled, "UNFPA."				D. Gurski; A.	To provide relevant information about	Authenticity	Relevant for information	-	
						Klepchukova; T.	the Flo app and to rebut Plaintiff's		about the Flo App,		
						Orlova; M. Scrobov	claims and request for damages.		background about Flo and its employees, and to rebut		
									Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0782	3/16/2022	Flo. (2022, March 16). Flo				D. Gurski; M.	To provide relevant information about	Not relevant to any claim or	Relevant for information	-	
		Health Inc. company update,				Scrobov	the Flo app and to rebut Plaintiff's	defense; outside class period	about the Flo App,		
		March 2022.					claims and request for damages.		background about Flo and its		
		https://flo.health/newsroom/flo-							employees, and to rebut		
		company-update							Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be authenticated at trial		
0783		Defendant Google LLC's Fourth				I. Hitt. C. Vorkonicos	Foundation for L. Hitt and C. Karkanias		authenticated at trial		
0/83		Supplemental Responses to				Google Fact	opinions; relevant for cross-examination			-	
		Plaintiffs' Interrogatories, Set				Witnesses	opinions, relevant for cross-examination	1			
		One.				Withesses					
0784	9/7/2017	Zavyalova, V. (2017, September				L. Hitt	Foundation for L. Hitt's opinion	Not relevant to any claim or	Relevant for information	-	
		7). New Russian tech app						defense	about the Flo App,		
		credited with 100,000							background about Flo and its		
		pregnancies a month. Russia							employees, and to rebut		
		Beyond.							Plaintiffs' claims and request		
		https://www.rbth.com/science-							for damages, as well as		
		and- tech/326110-new-russian-							establishing Flo's affirmative		
		tech-app-pregnancies							defenses and rebuttal to		
									plaintiffs' defenses; will be authenticated at trial		
0000	21012022	TI (2022 ) ( 1 0) 0				v vv.	D 1 : 0 7 77: 1 : 1				
0785	3/8/2022	Flo. (2022, March 8). Supporting our Flo community in Ukraine.	g			L. Hitt	Foundation for L. Hitt's opinion	Not relevant to any claim or		-	
		https://flo.health/newsroom/flo-						defense; outside class period	background about Flo and its		
		ukraine-support							employees, and to rebut		
		ukranic-support							Plaintiffs' claims and request		
									for damages, as well as		
									establishing Flo's affirmative		
									defenses and rebuttal to		
									plaintiffs' defenses; will be		
									authenticated at trial		
0786		Vildan Altuglu, Lorin M. Hitt, S.	-			L. Hitt	Foundation for L. Hitt's opinion			-	
		Hussain, and M. Li Bergolis,	1								
		"Valuation of Privacy: Assessing	3								
		Potential Harm from Unauthorized Access and Misuse	. ]								
		On Drivate Information in	ē								
		Consumer Class Actions," in	1								
		Legal Applications of Marketing									
		Theory, eds. Professors Jacob	`								
		Gersen and Joel Steckel.									
0787		Bevafa, H., Hitt, L., and	1			L. Hitt	Foundation for L. Hitt's opinion			-	
		Terwiesch, C. (2018,									
		December.)"The Impact of E-	1								
		Visits on Visit Frequencies and	1								
		Patient Health: Evidence from	1								
		Primary Care." Manage Sci.	1								
		64(12): 5461–5480.	1								
200		doi:10.1287/mnsc.2017.2900.	1								
0788		"Poaching and the	1			L. Hitt	Foundation for L. Hitt's opinion			-	
		Misappropriation of Information:									
		Transaction Risks of Information Exchange."	1								
	_	Exchange.	1	1				1			

Filing Starting Bates No. Document Da	nte Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order		Designation	Sponsoring Witness		Sponsoring Witness					
0789	N. Gregory Mankiw, Principles		Withess		L. Hitt	Foundation for L. Hitt's opinion			-	
	of Economics, Eighth Edition									
	(Boston, MA: Cengage Learning	g,								
	2018), p. 66 ("A market is a group of buyers and sellers of a									
	particular good or service. The									
	buyers as a group determine the									
	demand for the product, and the									
	sellers as a group determine the									
	supply of the product.").									
0790	Epsilon,				L. Hitt	Foundation for L. Hitt's opinion			-	
	https://www.epsilon.com/us/proc	d								
0004	ucts-and-services/data.				v . vv.					
0791	"Get in touch with mailing list customers," Exact Data,				L. Hitt	Foundation for L. Hitt's opinion			-	
	https://www.exactdata.com/cons	su								
	mer-mailing-lists.html									
0792	B2C (Business to Consumer)				L. Hitt	Foundation for L. Hitt's opinion			-	
	Master File Email/Postal/Phone,	,"								
	Exact Data,									
	https://www.exactdata.com/down loaddocs/ Exact-Data-B2C-	n								
	Master-File-Rate- Card.pdf									
0793	Alice Scott, "Consumer Mailing	:			L. Hitt	Foundation for L. Hitt's opinion			-	
	Lists," leadsplease, April 3,									
	2024,									
	https://www.leadsplease.com/ma linglists/ consumer	ai								
0794 7/1/2024	Alice Scott, "Buy Email Lists &				L. Hitt	Foundation for L. Hitt's opinion			_	
0754	Email Address Lists,"	1			L. IIII	r ouncation for E. That's opinion				
	leadsplease, July 1, 2024,									
	https://www.leadsplease.com/em	na								
	il-lists/consumer#id_2				v . vv.					
0795	"Targeted Marketing Lists," Exact Data,				L. Hitt	Foundation for L. Hitt's opinion			-	
	https://www.exactdata.com/quot	te								
	/form.php	-								
0796	"Data Quality," leadsplease,				L. Hitt	Foundation for L. Hitt's opinion			-	
	https://www.leadsplease.com/da	ta								
0797	_quality				R. Bugaev	To provide relevant background during	And maintenant	D-1		
0/9/	Photos of R. Bugaev				R. Bugaev	direct examination	Authenticity; relevance	Relevant for information about the Flo App,		
						un cot externmenton		background about Flo and its		
								employees, and to rebut		
								Plaintiffs' claims and request		
								for damages, as well as		
								establishing Flo's affirmative defenses and rebuttal to		
								plaintiffs' defenses; will be		
								authenticated at trial		
0798	Photos of D. Gurski				D. Gurski	To provide relevant background during	Authenticity; relevance	Relevant for information		
						direct examination		about the Flo App,		
								background about Flo and its employees, and to rebut		
								Plaintiffs' claims and request		
								for damages, as well as		
								establishing Flo's affirmative		
								defenses and rebuttal to		
								plaintiffs' defenses; will be authenticated at trial		
0799	Photos of A. Klepchukova				A. Klepchukova	To provide relevant background during	Authenticity: relevance	Relevant for information		
	1 10103 01 71. Istepellukova				reioponukova	direct examination	. ranomony, relevance	about the Flo App,		
								background about Flo and its		
								employees, and to rebut		
								Plaintiffs' claims and request		
								for damages, as well as establishing Flo's affirmative		
								defenses and rebuttal to		
								plaintiffs' defenses; will be		
								authenticated at trial		

Filing Order Starting Bates No. Document Date	<b>Document Description</b>	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	efendants' Objections	Plaintiffs' Response
0800	Chart of 12 CAEs		Withess		R. Bugaev; L. Lydon	To provide relevant background during				
0801 FLO-00073498	FLO-00073498				T. Orlova		Not relevant to any claim or defense	Relevant to rebutting Plaintiffs' claims for punitive damages		
0802	Photos of M. Scrobov				M. Scrobov	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated a trial		
0803	Photos of T. Orlova				T. Orlova	To provide relevant background during direct examination		Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0804	Photos of L. Lydon				L. Lydon	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0805	Photos of S. Schumacher				S. Schumacher	To provide relevant background during direct examination	Authenticity; relevance	Relevant for information about the Flo App, background about Flo and its employees, and to rebut Plaintiffs' claims and request for damages, as well as establishing Flo's affirmative defenses and rebuttal to plaintiffs' defenses; will be authenticated at trial		
0806	Video of Flo App Transmitting App Event Data Using Produced APKs and Binaries				C. Karkanias; R. Bugaev; L. Lydon	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity	Relevant to providing context on the Flo app and showing its operation; available features of the app; the transmission of CAEs, which will be helpful to rebutting Plaintiffs' claims at trial		
0807	Flo Health Consent Screens				S. Schumacher; M. Scrobov; C. Karkanias	To establish Flo's affirmative defense and rebut all of Plaintiff's claims				
0808	Glow Privacy Policies // Terms of Service				S. Schumacher	and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0809	Stardust Privacy Policies // Terms of Service	Š			S. Schumacher	and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		
0810	Fertility Friend FF Privacy Policies // Terms of Service				S. Schumacher	To establish Flo's affirmative defense and rebut all of Plaintiff's claims	Authenticity; relevance	Relevant to evaluating pertinent industry standards and rebutting plaintiffs' intrusion of privacy/claim for punitive damages		

Filing Order Starting Bates No. Document Date		gnation Spo	intiffs' Plaintiffs' Exhibit Purpose onsoring tness	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0811	Ovia Privacy Policies // Terms of			S. Schumacher	To establish Flo's affirmative defense	Authenticity; relevance	Relevant to evaluating		
	Service				and rebut all of Plaintiff's claims		pertinent industry standards and rebutting plaintiffs'		
							intrusion of privacy/claim for		
0812	Natural Cycles Privacy Policies //			S. Schumacher	To establish Flo's affirmative defense	Authanticity, salaromaa	punitive damages Relevant to evaluating		
0012	Terms of Service			S. SCHUINACHEF	and rebut all of Plaintiff's claims	Authoriticity, relevance	pertinent industry standards		
							and rebutting plaintiffs'		
							intrusion of privacy/claim for punitive damages		
0813	Demonstrative vdeo of the Flo			S. Schumacher; A.	To establish Flo's affirmative defense	Authenticity; relevance	Relevant to providing context		
	App			Klepchukova; C.	and rebut all of Plaintiff's claims		on the Flo app and showing		
				Karkanias; L. Lydon			its operation; available features of the app; and the		
							like		
0814	Clue Privacy Policies // Terms of			S. Schumacher	To establish Flo's affirmative defense	Authenticity; relevance	Relevant to evaluating		
	Service				and rebut all of Plaintiff's claims		pertinent industry standards and rebutting plaintiffs'		
							intrusion of privacy/claim for		
							punitive damages		
0815	Flo Annual Revenues / Financials			T. Orlova	To establish Flo's affirmative defense and rebut all of Plaintiff's claims and	Authenticity; relevance	Relevant to rebutting Plaintiffs' claims for punitive		
					request for damages		damages		
0816	Photos of C. Karkanias			C. Karkanias	To establish Flo's affirmative defense	Authenticity; relevance	Relevant to establishing		
					and rebut all of Plaintiff's claims		background and qualifications of expert		
							witness		
0817 FLO-00070876	Email re: Apple's restriction of			D. Gurski; R. Bugaev	To establish Flo's affirmative defense				
	using 3rd party tools by health apps				and rebut all of Plaintiff's claims				
0818	Article compilation regarding			Cross Examination of		Authenticity; relevance	Relevant to Flo's affirmative		
	data sharing and Facebook			Named Plaintiffs	and rebut all of Plaintiff's claims		defense on statute of		
							limitations; will be authenticated at trial		
0819	Article compilation regarding			Cross Examination of	To establish Flo's affirmative defense	Authenticity; relevance	Relevant to Flo's affirmative		
	data sharing and Flo Health			Named Plaintiffs	and rebut all of Plaintiff's claims		defense on statute of		
							limitations; will be authenticated at trial		
0820	Sarah Wellman 1/11/2023			S. Wellman	To establish Flo's affirmative defense				
	Deposition Exhibit 47 - Email				and rebut all of Plaintiff's claims; cross- examination of the Named Plaintiffs	-			
0821	Photos of Flo Offices			D. Gurski; A.	To provide relevant background during	Authenticity; relevance	Relevant to establishing		
				Klepchukova; T.	direct examination		background/context about		
				Orlova; R. Bugaev; S Schumacher; M.			Flo and its employees as well as rebutting punitive damages		
				Scrobov			as resuming pulltive dailages		
0822	Screenshot of FTC customer			M. Scrobov	To rebut Plaintiff's claims should the	-			
	notice, regarding Flo Period & Ovulation Tracker app identifying				Court deny MIL No. 4				
	numbers.								
0823 FLO-00003063 5/25/2018	Facebook Business Tools Terms, Confid	idential		Flo Witness; A.	Relevant to Consent, Relevant to	-		-	
	effective May 25, 2018			Dahiya; T. Wooldridge; S.	License Defense, Relevant to Authorization				
				Satterfield; F. Leach;	A MARIO IZUUOII				
	P. 70 XV			J. Onuchina					
0824 FLO-00025695 2/22/2019	Email from Julia to Confid Support@owhealth re Period	dential		Flo Witness	Relevant to Superseding or Intervening Cause	-		-	
	Tracker Flo, Pregnancy &				Cutto				
	Ovulation Calendar -account								
0825 FLO-00025710 2/24/2019	deletion request Email to Support@owhealth re Confid	idential		Flo Witness	Relevant to Superseding or Intervening	-		-	
	Delete account and all data				Cause				
0826 FLO-00025907 2/26/2019		dential		Flo Witness	Relevant to Superseding or Intervening	-		-	
	support@owhealth.com re Flo 4.23.0				Cause				
0827 FLO-00025920 4/20/2019	Email from Minjee to Confid	dential		Flo Witness	Relevant to Superseding or Intervening	-		-	
	support@owhealth.com re Flo				Cause				
0828 FLO-00025926 5/1/2019	4.29.1 Email from Tracy to Confid	dential		Flo Witness	Relevant to Superseding or Intervening	-		-	
3.72019	support@owhealth.com re Flo				Cause				
	4.30.0								

Filing Sta Order	rting Bates No.	Document Date   Document Description	Confidentiality Designation	Plaintiffs' Plaintiffs' Exhibit Sponsoring Witness	Purpose Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response Defendants' Objections	Plaintiffs' Response
0829 FLC	D-00104800	n/a Flo Welcome Screen	Confidential	Witness	Plaintiffs; Flo Witness	Relevant to Consent, Relevant to License Defense	-	-	
0830 Floi 796	health_Egelman_00000	n/a APK files from Egelman repo	ort Confidential		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0831 Floi 666	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000266	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0832 Floi 667	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000266	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0833 Flol 668	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000266	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0834 Flol 669	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000266	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0835 Floi 670	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0836 Floi 671	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0837 Floi 672	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
673	health_Egelman_00002	Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0839 Flol 674	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
675	health_Egelman_00002	Flohealth_Egelman_0000267			S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0841 Flol 676	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0842 Floi 677	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0843 Floi 678	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO 8		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0844 Floi 679	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000267	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0845 Floi 680	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000268	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0846 Floi 681	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000268	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0847 Floi 682	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000268	HC-AEO 2		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0848 Floi 683	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000268	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0849 Floi 684	health_Egelman_00002	n/a Logs from Egelman report: Flohealth_Egelman_0000268	HC-AEO		S. Egelman; G. Zervas	Relevant to Absence of Eavesdropping, Expert Cross-Examination	-	-	
0850 Floi 720	health_Golbeck_00004	2018-06 (2023- 07-11) Golbeck, Jennifer, "Predictin Alcoholism Recovery from Twitter"	g Confidential		J. Golbeck	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of	-	-	
	NT-FRASCO-Zervas- 00006	4/19/2023 Meta Business Help Center, (accessed) "About app events"	n/a		A. Lapitski; T. Wooldridge	Confidentiality, Relevant to Estoppel Relevant to Absence of Eavesdropping	-	-	

1
-

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0873	META-FRASCO- 0000019875	2/22/2019	Email from twolverton@businessinsider.com	Confidential	Witness		S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0074		2/22/2010	to Meta				-					
0874	META-FRASCO- 0000019943	2/22/2019	Email between N. Anklesaria an- laurence.dodds@telegraph.co.uk				S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0875	META-FRASCO- 0000019959	2/22/2019	Email from mike.lasusa@law360.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0876	META-FRASCO- 0000019995	2/22/2019	Email between N. Anklesaria and queenie.wong@cbsinteractive.com				S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0877	META-FRASCO- 0000020049	2/22/2019	Email from Amanda.L.delCastillo@abc.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0878	META-FRASCO- 0000020050	2/22/2019	Email from MAnderson@ap.org to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0879	META-FRASCO- 0000020052	2/22/2019	Email from Lauren.Feiner@nbcuni.com to Meta	Confidential				Relevant to Superseding or Intervening Cause	-		-	
0880	META-FRASCO- 0000020055	2/22/2019	Email from michael_kan@ziffdavis.com to Meta	Confidential			S. Satterfield; A. Dahiya	Relevant to Superseding or Intervening Cause	-		-	
0881	META-FRASCO-	2/22/2019	Email between N. Anklesaria an	d Confidential				Relevant to Superseding or Intervening	-		-	
0882	0000020060 META-FRASCO- 0000023838	n/a	dave.lee@bbc.co.uk Media Inquiry Playbook	HC-AEO				Cause Relevant Background	-		-	
0883	META-FRASCO- 0000028004	Oct. 2019	Meta, "Facebook Business Tools Security Guide"	s Confidential			Flo Witness; A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; O. Bagdasarov	Relevant to Absence of Eavesdropping	Duplicative of META- FRASCO-0000027855- 0000027895	N/A	-	
0884	META-FRASCO- 0000369433	n/a	Meta, Flo App Event Optimizations	HC-AEO				Relevant to Absence of Eavesdropping	-		-	
0885	META-FRASCO- 0000369515	n/a	Meta, "About ad delivery," Business Help Center article for advertisers	n/a			T. Wooldridge; J. Zheng; F. Leach	Relevant to Absence of Eavesdropping	-		-	
0886	META-FRASCO- 0000407022	n/a	Custom and LAL Audiences Created by Flo	HC-AEO			K. Shah; A. Lapitski	Relevant to Superseding or Intervening Cause, Relevant to Damages	-		-	
0887	META-FRASCO- 0000407206	11/22/2022	Meta "3d Party Data Retention Policy"	HC-AEO			T. Wooldridge	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0888	META-FRASCO-	n/a	Meta, "Hive Anon"	HC-AEO			T. Wooldridge	Relevant Background	-		-	
0889	0000407229 META-FRASCO-Zervas- 00000007	8/20/2021	Patel, Ronak, "Things to conside while Integrating 3rd Party services in your Mobile App," AGLOWID, https://aglowiditsolutions.com/bl g/integrating-3rd-partyservices-in mobile-app'	o			G. Zervas	Relevant to Absence of Eavesdropping, Relevant to Superseding or Intervening Cause			-	
0890	META-FRASCO-Zervas- 00000045	1/25/2020	Westenberg, Jimmy, "We asked, you told us: 65% of you throw caution to the wind and autoupdate apps," Android Authority, https://www.androidauthority.com/auto-update-apps-google-playstore-poll-results-1077403/					Relevant to Absence of Eavesdropping, Relevant to Superseding or Intervening Cause				
0891	META-FRASCO-Zervas- 00000157	9/14/2022	Flo Privacy Policy (archived), https://flo.health/privacy- policyarchived/ 14-september-2022, accessed	n/a			Plaintiffs; Flo Witness; G. Zervas	Relevant to Consent, Relevant to License Defense, Relevant to Authorization	-		-	
0892		3/7/2023	April 1, 2024 2023-03-07 Jennifer Chen's Supplemental R&Os to Non Flo Defs ROGs (Confidential)	Confidential				Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Waiver, Relevant to Consent/Ratification, Relevant to Expectations of Confidentiality, Relevant to Estoppel	-		-	

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0893		3/7/2023	2023-03-07 Tesha Gamino's	Confidential	witness		T. Gamino	Relevant to defending Plaintiffs' CIPA	-		-	
			Supplemental R&Os to Non Flo					632 claim, Relevant to Waiver,				
			Defs ROGs (Confidential)					Relevant to Consent/Ratification,				
								Relevant to Expectations of Confidentiality, Relevant to Estoppel				
0894		3/7/2023	2023-03-07 Sarah Wellman's	Confidential			S. Wellman	Relevant to defending Plaintiffs' CIPA	-		-	
			Supplemental ROG Responses to	0				632 claim, Relevant to Waiver,				
			Non Flo Defs ROGs (Confidential)					Relevant to Consent/Ratification, Relevant to Expectations of				
			(Confidential)					Confidentiality, Relevant to Estoppel				
0895	n/a	4/10/2019	Harwell, Drew, "Is your	n/a			Plaintiffs; A. Dahiya	Relevant to Absence of Eavesdropping,			-	
			pregnancy app sharing your				S. Satterfield	Explain Operation of the Technologies,				
			intimate data with your boss?," Washington Post					Expert Foundation				
0896	n/a	1/25/2022	Capterra, "Improve Your First-	n/a			Flo Witness	Relevant to Absence of Eavesdropping,			-	
			Party Data Strategy - Our Search					Explain Operation of the Technologies,				
			Shows You How"					Expert Foundation				
0897	n/a	7/8/2015	Marketing Week, "Consumers are 'dirtying' databases with false				Flo Witness	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies,			-	
			details"					Expert Foundation				
0898		7/11/2023	J. Golbeck Website Screenshot				J. Golbeck	Relevant to defending Plaintiffs' CIPA	-		-	
								632 claim, Relevant to Waiver,				
								Relevant to Consent/Ratification, Relevant to Expectations of				
								Confidentiality, Relevant to Estoppel				
0899		7/11/2023	Reddit thread titled "I'm a				J. Golbeck	Relevant to defending Plaintiffs' CIPA	-		-	
			computer scientist studying					632 claim, Relevant to Waiver,				
			creepy things we can do with your online data -AMA"					Relevant to Consent/Ratification, Relevant to Expectations of				
			your omme data 111111					Confidentiality, Relevant to Estoppel				
0900	n/a	8/12/2018	Flo Privacy Shield certification	n/a			Flo Witness	Relevant to Intervening or Supserseding	g -		-	
0001		8/2/2023	List Circuit Com C. E. Jane				C. E. J.	Cause Relevant to Bias, Expert Cross-				
0901	n/a	8/2/2023	List of invoices from S. Egeleman	in n/a			S. Egelman	Examination	-		-	
0902	n/a	5/3/2024	Expert Report of G. Zervas, Ph.D.	HC AEO			G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0903	n/a	6/28/2024	Expert Rebuttal Report of G. Zervas, Ph.D.	HC AEO			G. Zervas	Relevant to Absence of Eavesdropping	-		-	
0904	n/a	10/20/2022	Plaintiff Jennifer Chen's	Confidential			J. Chen	Relevant to Waiver, Relevant to	-		-	
			Amended Objections and					Consent/Ratification, Relevant to				
			Responses to Defendants' (Meta Platforms, Inc., Google LLC, and					Expectations of Confidentiality, Relevant to Estoppel				
			Flurry, LLC) First Set of	u				Refevant to Estopper				
			Interrogatories									
0905		9/15/2022	2022-09-15 Jennifer Chen's R&C	O Confidential			J. Chen	Relevant to defending Plaintiffs' CIPA	-		-	
			to Flo Health's ROGs (Confidential)					632 claim, Relevant to Waiver, Relevant to Consent/Ratification,				
			(Comidential)					Relevant to Expectations of				
								Confidentiality, Relevant to Estoppel				
0906	n/a	9/15/2022	Plaintiff Sarah Wellman's	Confidential			S. Wellman	Relevant to Waiver, Relevant to Consent/Ratification, Relevant to	-		-	
			Responses and Objections to Defendant Flo Health, Inc.'s					Consent/Ratification, Relevant to Expectations of Confidentiality,				
			Interrogatories					Relevant to Estoppel				
0907	n/a	9/15/2022	Plaintiff Tesha Gamino's	Confidential			T. Gamino	Relevant to Waiver, Relevant to	-		-	
			Responses and Objections to Defendant Flo Health, Inc.'s					Consent/Ratification, Relevant to Expectations of Confidentiality,				
			Interrogatories					Relevant to Estoppel				
0908	n/a	Jul-19	Monella, L., "Beware of fertility	n/a			Plaintiffs; A. Dahiya	Relevant to Absence of Eavesdropping,			-	
			apps — your data may be sold to	)			S. Satterfield	Explain Operation of the Technologies,				
			companies, warns think tank,"					Expert Foundation				
			Euronews, available at https://www.euronews.com/2018	3/								
			04/11/beware-of-fertility-apps-	1								
			your-data-may-be-sold-to-	1								
0000	/-	2022	companies-warns-think-tank				C 7	Delements Alema CE 1				
0909	n/a	2022	Berman, Ron, and Ayelet Israeli, "The Value of Descriptive	, n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies,			-	
			Analytics: Evidence from Online					Expert Foundation				
			Retailers," Marketing Science,									
			Vol. 41, No. 6, 2022, pp. 1074- 1096	1								
Ц			1070	1				1	1	_1		

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0910	n/a	2023	Chung, Moonwon, Luv Sharma, and Manoj K. Malhotra, "Impact of Modularity Design on Mobile App Launch Success," Manufacturing & Service Operations Management, Vol. 25, No. 2, pp. 756-774		willess		G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0911	n/a	Jan. 2008		n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0912	n/a	8/25/2021	Abdul, Shan, "Google Play Store Isn't Auto-Updating Apps? Try These Fixes," MakeUseOf, https://www.makeuseof.com/goog le-play-store-not-auto-updating- apps/, accessed May 5, 2023				G. Zervas				-	
0913	n/a	4/15/2024 (accessed)	Amazon Web Services, "What is an SDK? - SDK Explained," https://aws.amazon.com/whatis/s dk/, accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0914	n/a	4/17/2023 (accessed)	Amazon Web Services, "What is Caching and How it Works," https://aws.amazon.com/caching/, accessed April 17, 2023				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0915	n/a	4/15/2024 (accessed)	Android, "The activity lifecycle - Android Developers," https://developer.android.com/gui de/components/activities/activity- lifecycle, accessed April 15, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0916	n/a	4/15/2024 (accessed)	Studio & App Tools - Android Developers," https://developer.android.com/stu dio, accessed April 15, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0917	n/a	4/15/2024 (accessed)	Android, "Kotlin and Android - Android Developers," https://developer.android.com/kot lin, accessed April 15, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0918	n/a	4/1/2024 (accessed)					G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0919	n/a	4/15/2024 (accessed)	Apple, "About Objective-C   Apple Developer," https://developer.apple.com/librar y/archive/documentation/Cocoa/C onceptual/ProgrammingWithObje ctiveC/Introduction/Introduction.h tml, accessed April 15, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0920	n/a	4/29/2024 (accessed)	Apple, "AdSupport Framework   Apple Developer Documentation," https://developer.apple.com/docu mentation/adsupport, accessed April 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0921	n/a	4/1/2024 (accessed)	Apple, "advertisingIdentifier   Apple Developer Documentation," https://developer.apple.com/documentation/adsupport/asidentifier manager/advertisingidentifier, accessed April 1, 2024		William		G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0922	n/a	4/15/2024 (accessed)	Apple, "Handling Common State Transitions   Apple Developer Documentation," https://developer.apple.com/docu mentation/watchki/life_cycles/handling_common_state_transitions_, accessed April 15, 2021	1			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0923	n/a	9/16/2020	Apple, "iOS 14 is available today," https://www.apple.com/newsroor/2020/09/ios-14-is-available-today/, accessed April 22, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0924	n/a	4/16/2024 (accessed)	Apple, "Managing your app's life cycle   Apple Developer Documentation," https://developer.apple.com/documentation/uikit/app_and_environment/managing_your_app_s_life- cycle, accessed April 16, 2024	fe n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation				
0925	n/a	4/15/2024 (accessed)	Apple, "Reducing terminations ir your app   Apple Developer Documentation," https://developer.apple.com/docu mentation/xcode/reduce- terminations-in-your-app, accessed April 15, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0926	n/a	4/15/2024 (accessed)	Apple, "Swift   Apple Developer," https://developer.apple.com/swift , accessed April 15, 2024	n/a ît/			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0927	n/a	4/29/2024 (accessed)	Apple, "User privacy and data use - App Store - Apple Developer," https://developer.apple.com/app- store/user-privacy-and-data-use/, accessed April 29, 2024	-			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0928	n/a	9/13/2016	Apple, "What's new in iOS 10 - Apple Newsroom," https://www.apple.com/newsroor/2016/09/whats-new-in-ios-10/	m			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0929	n/a	4/15/2024 (accessed)	Apple, "Xcode 15   Apple Developer," https://developer.apple.com/xcod /, accessed April 15, 2024	n/a de			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0930	n/a	1/6/2023	AppMySite, "Android vs iOS: Mobile Operating System market share statistics you must know," https://www.appmysite.com/blog android-vs-ios-mobile- operatingsystem-market-share- statistics-you-must-know/, accessed April 17, 2023	et			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0931	n/a	1/23/2024	AppMySite, "What is an IPA file and how can you open one?," https://www.appmysite.com/blog what-is-an-ipa-file-and-how-can- you-open-one/, accessed April 15, 2024	g/			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0932	n/a	11/2/2023	AppsFlyer, "Impact of Apple Limit Ad Tracking on attribution (before iOS 14)," https://support.appsflyer.com/hc/e n-us/articles/115003734626- Impact-of-Apple-Limit-Ad- Tracking-on-attribution-before- iOS-14, accessed April 2, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0933	n/a	3/29/2024 (accessed)	AppsFlyer, "Meta ads integration setup," https://support.appsflyer.com/hc/c nus/articles/207033826-Meta-ads integration-setup, accessed March 29, 2024	e			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0934	n/a	4/22/2024 (accessed)	AppsFlyer, "What is limit ad tracking?," https://www.appsflyer.com/glossary/limit-ad-tracking/, accessed April 22, 2024	n/a a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0935	n/a	5/8/2023 (accessed)	Apptopia, "About: Flo Ovulation & Period Tracker (Google Play version)," https://apptopia.com/google- play/app/org.iggymedia.periodtra cker/about, accessed May 8, 2023				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0936	n/a	n/a	Apptopia, "About: Flo Period Tracker & Calendar," https://apptopia.com/unified/app/ 8126583949/about	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0937	n/a	1/19/2022	Bilal, Ahmad, "General Techniques of API Caching," Rapid, https://rapidapi.com/guides/api- caching-techniques	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0938	n/a	5/19/2023	Codex, Arthur C., "Mastering the iOS App Life Cycle: From Launch to Termination," Reintech, https://reintech.io/blog/mastering ios-app-life-cycle, accessed April 15, 2024	3-			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0939	n/a	5/11/2022	Cyphers, Bennett, "How to Disable Ad ID Tracking on iOS and Android, and Why You Should Do It Now," Electronic Frontier Foundation, https://www.efi.org/deeplinks/20 22/05/how-disable-ad-id-tracking ios-and-android-andwhy- you-should-do-it-now, accessed April 22, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation			-	
0940	n/a	3/29/2024 (accessed)	Flo Privacy Policy (archived), https://flo.health/privacy-policy- archived, accessed March 29, 2024	n/a			G. Zervas; Flo Witness	Relevant to Consent, Relevant to License Defense, Relevant to Authorization, Expert Foundation	-		-	
0941	n/a	4/24/2024 (accessed)	Github, "Issues facebook facebook facebook facebook facebook/ facebook/facebook/facebook/facebook-iossdk/ issues, accessed April 24, 2024	n/a b			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0942	n/a	4/2/2024 (accessed)	Global App Testing, The State of Consumer App Habits, 2020, https://fh.bubspotusercontent30.nei /hubfs/540930/The%20State%20 of%20Consumer%20 App%20Habits%202020.pdf, accessed April 2, 2024	t			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0943	n/a	4/29/2024	Google, "Advertising ID," https://support.google.com/google play/androiddeveloper/answer/60 48248, accessed April 29, 2024	n/a	Withess		G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0944	n/a	8/2/2016	Gray, Stacey, "iOS 10 to Feature Stronger 'Limit Ad Tracking' Control," Future of Privacy Forum, https://fpf.org/blog/ios-10 feature-stronger-limit-ad- tracking/				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0945	n/a	1/30/2024	Hanson, Scott, "Benefits of Using SDKs in Improving the User Experience of Educational Software and Apps," Kitaboo, https://kitaboo.com/sdk-to-improveeducational-software-ux/, accessed April 2, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0946	n/a	7/13/2021	IBM Cloud Education, "SDK vs. API: What's the Difference?," https://www.ibm.com/cloud/blog/ sdk-vs-api				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0947	n/a	4/17/2023 (accessed)	Joby, Amal, "Mobile Apps," G2, https://www.g2.com/glossary/mo bile-apps, accessed April 17, 2023				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0948	n/a	10/12/2023	Kravets, Andrii, "Navigating App Bugs: Common Types and Bug Examples," Forbytes, https://forbytes.com/blog/app- bugs-meaning/, accessed April 2, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0949	n/a	12/30/2023	Kurzweg, Jonas, "How to set up mobile app event tracking – the complete guide for 2024," UXCam, https://uxcam.com/blog/mobile- app-event-tracking/, accessed March 31, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0950	n/a	10/30/2023	Kurzweg, Jonas, "Top Analytics SDKs 2024 [Updated]," UXCam, https://uxcam.com/blog/top- analytics-sdks/, accessed March 31, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0951	n/a	1/31/2019	M, Shivkumar, "What is an SDK? Everything You Need to Know," CleverTap, https://clevertap.com/blog/what-is an-sdk/, accessed April 1, 2024	n/a s-			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
	n/a	9/25/2023	mDevelopers, "What Does It Mean When an App Has a Bug?," https://mdevelopers.com/blog/und erstanding-software-bugs-causes- impact-solutions, accessed April 2, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0953	n/a	4/19/2023 (accessed)	Meta, "About app events and advertising on Facebook and Instagram - Meta Business Help Center," https://www.facebook.com/busine syhelp/235457266642587, accessed April 19, 2023	n/a			A. Lapitski; G. Zervas; B. Zhu; F. Leach; T. Frantsuzenko	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Dat		Confidentiality Designation	Plaintiffs' Plaintiffs' Exhibit Purpose Sponsoring Witness	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0954		4/27/2023 (accessed)	SDK for Android," https://developers.facebook.com/d ocs/android/change-log-4x, accessed April 27, 2023	n/a	YHIIICSS	Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0955	n/a	5/1/2024 (accessed)	Meta, "Changelog," https://developers.facebook.com/d ocs/ios/change-log-4x/, accessed May 1, 2024	n/a		G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0956	n/a	4/27/2023 (accessed)		n/a		G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0957	n/a	4/20/2023 (accessed)	Meta, "Facebook Meta App Events," https://developers.facebook.com/d ocs/app-events/reference, accessed April 20, 2023	n/a		A. Lapitski; G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0958	n/a	4/17/2023 (accessed)	Meta, "Facebook SDK for Android," Github, https://github.com/facebook/faceb ook-android-sdk, accessed April 17, 2023	n/a		G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0959	n/a	4/17/2023 (accessed)	Meta, "Facebook SDK for iOS," I Github, https://github.com/facebook/faceb ook-ios-sdk, accessed April 17, 2023	n/a		G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0960	n/a	4/19/2024 (accessed)	Meta, "FAQ - Meta App Events," https://developers.facebook.com/d ocs/app-events/faq/, accessed April 19, 2024	n/a		A. Lapitski; G. Zervas; B. Zhu; F. Leach; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0961	n/a	3/2/2017	Meta, "FBSDKAppEvents," Wayback Machine, as of March 2, 2017, 10302061843/https://developers.fa cebook.com/docs/reference/ios/cu rrent/class/FBSDKAppEvents/	n/a			Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation				
0962	n/a	4/19/2024 (accessed)	Meta, "Get Started - Facebook SDK for iOS," https://developers.facebook.com/d ocs/ios/gettingstarted, accessed April 19, 2023	n/a			Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0963	n/a	4/20/2023 (accessed)	Meta, "Get Started with App Events (Android)," https://developers.facebook.com/d ocs/appevents/getting-started-app- events-android, accessed April 20, 2023	n/a		G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0964	n/a	4/20/2023 (accessed)	Meta, "Get Started with App Events (iOS)," https://developers.facebook.com/d oos/appevents/getting-started-app- events-ios, accessed April 20, 2023	n/a		G. Zervas; B. Zhu; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0965	n/a	4/19/2023 (accessed)	Meta, "Getting Started - Facebook SDK for Android," https://developers.facebook.com/d ocs/android/getting-started, accessed April 19, 2023	n/a		G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0966	n/a	5/8/2023 (accessed)	Meta, "HelloFacebookSample," (Github, https://github.com/facebook/facebook-androidsdk/tree/main/samples/He IloFacebookSample, accessed May 8, 2023	n/a		G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Da	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
	n/a	4/25/2023	Terms," https://www.facebook.com/legal/t erms/businesstools, effective date April 25, 2023, accessed May 8, 2023		Withess		A. Dahiya; T. Wooldridge; S. Satterfield; F. Leach; J. Onuchina	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0968	n/a	4/19/2024 (accessed)	Mozilla, "Client-side storage - MDN Web Docs," https://developer.mozilla.org/en- US/docs/Learn/JavaScript/Client- side_web_APIs/Client- side_storage, accessed April 19, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	_			
0969	n/a	4/25/2022	NetApp, "What is cache flushing?," https://docs.netapp.com/us-en/e- seriessantricity-115/sm- settings/what-is-cache- flushing.html, accessed April 19, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0970	n/a	2/1/2013	OSXDaily, "How (& Why) to Reset the Advertising Identifier in iOS," https://osxdaily.com/2013/02/01/r eset-advertising-identifier-ios/, accessed April 2, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0971	n/a	6/23/2017	Ramel, David, "Analytics Tops Android SDK List, Firebase Back-End Is Hot," ADTmag, https://adtmag.com/articles/2017/ 06/23/android-sdk-report.aspx, accessed April 29, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0972	n/a	8/7/2020	Rouse, Margaret, "What is a Mobile Application?," Techopedia, https://www.techopedia.com/defi nition/2953/mobile-application- mobile-app	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0973	n/a	5/5/2023	Samanta, Orvill, "What is Limit Ad Tracking (LAT)?," Priori Data, https://prioridata.com/glossary/li mit-ad-tracking, accessed April 18, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0974	n/a	8/8/2016	Scufert, Eric Benjamin, "IDFA zeroing in iOS 10 will change mobile advertising," https://mobiledevmemo.com/idfa- zeroing-ios-10-change-mobile- advertising, accessed April 23, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-			
0975	n/a	10/13/2022	Shah, Parth, "Top 8 Ways to Fix Apps Not Updating Automatically on iPhone," Guiding Tech, https://www.guidingtech.com/fix- apps-not-updating-automatically- oniphone/				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
	n/a	11/21/2023	Shchegolskyi, Iurii, "In-App Events: What to Track in an App & Why," adjoe, https://adjoc.io/glossary/in-app- events/, accessed April 19, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0977	n/a	4/15/2024 (accessed)					G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Filing Order	Starting Bates No.	Document Date	e Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
0978	n/a	4/18/2024 (accessed)	SOS Support, "Android VS IOS Market Share Per Country 2022, https://www.sossupport.net/blog/ android-vs-ios-market-share-per- country-2022, accessed April 18, 2024	-	77 1111.53		G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0979	n/a	5/1/2024 (accessed)	Stripe, "Security at Strip   Stripe Documentation," https://docs.stripe.com/security, accessed May 1, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0980	n/a	4/15/2024 (accessed)	Studytonight, "Android Activity, its Lifecycle and States - Androic Development Tutorial," https://www.studytonight.com/an droid/activity-in-android, accessed April 15, 2024	d			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0981	n/a	2/10/2023	Thomas, Dana, "Using caching strategies to improve API performance," https://www.torocloud.com/blog/ using-caching-strategies-to- improve-api-performance				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0982	n/a	3/7/2023	Virtual Spirit Technology, "A Complete Guide on Securing Third-Party APIs in Mobile Apps," https://virtualspirit.me/insights/1/ 9/a-complete-guide-on-securing- thirdparty-apis-in-mobile-apps	6			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
0983	n/a	11/9/2023	Zibreg, Christian, "One out of five iPhone users in the U.S. hav Limit Ad Tracking turned on," iDownloadBlog, https://www.idownloadblog.com 2016/1017/noout-of-five-iphon users-in-the-u-s-have-limit-ad- tracking-turned-on/, accessed April 22, 2024	e /			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation				
0984			org.iggymedia.periodtracker-1-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0985			org.iggymedia.periodtracker-25-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0986			org.iggymedia.periodtracker-56-flo.				G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0987			org.iggymedia.periodtracker-74-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0988			org.iggymedia.periodtracker-50000-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0989			org.iggymedia.periodtracker- 60000-flo.	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0990			ios-1	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	
0991			ios-2	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA 632 claim, Relevant to Absence of Eavesdropping, Expert Cross- Examination	-		-	

Filing	Starting Bates No.	Document Dat	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness		•			
0992			ios-3	HC-AEO	Witness		G. Zervas	Relevant to defending Plaintiffs' CIPA	-		-	
								632 claim, Relevant to Absence of				
								Eavesdropping, Expert Cross- Examination				
0993			ios-4	HC-AEO			G. Zervas	Relevant to defending Plaintiffs' CIPA	-		-	
								632 claim, Relevant to Absence of Eavesdropping, Expert Cross-				
								Examination				
0994	n/a	9/21/2023	Plaintiffs' Motion for Class Certification	Under Seal			Plaintiffs	Relevant Background	-		-	
0995	n/a	Jul-14	Arapakis, Ioannis, Xiao Bai, and	l n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
			B. Barla Cambazoglu, "Impact of Response Latency on User	of				Explain Operation of the Technologies, Expert Foundation				
			Behavior in Web Search,"					Expert Foundation				
			Association for Computing									
0996	n/a	10/28/2021	Machinery, pp. 103-112 Berisha, Visar, Chelsea	n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
			Krantsevich, P. Richard Hahn,					Explain Operation of the Technologies,				
			Shira Hahn, Gautam Dasarathy, Pavan Turaga, and Julie Liss,					Expert Foundation				
			"Digital medicine and the curse									
			of dimensionality," npj Digital Medicine, Vol. 4, No. 153									
0997	n/a	Dec. 1997	Blum, Avrim L., and Pat Langley	y, n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
			Selection of relevant features and	d				Explain Operation of the Technologies,				
			examples in machine learning Vol. 97, Artificial Intelligence					Expert Foundation				
			, ,									
0998	n/a	2019	Burkov, Andriy, The Hundred- Page Machine Learning Book	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies,	-		-	
								Expert Foundation				
0999	n/a	9/5/2021	Gupta, Nitin, Hima Patel, Shazia Afzal, Naveen Panwar, Ruhi	a n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies,	-		-	
			Sharma Mittal, Shanmukha					Expert Foundation				
			Guttula, Diptikalyan Saha,									
			"Data Quality Toolkit: Automati assessment of data quality and	ic								
			remediation for machine learning	g								
1000	n/a	2015	datasets" Kelleher, John D., Brian Mac	n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
1000		2013	Namee, and Aoife D'Arcy,				G. Zervas	Explain Operation of the Technologies,				
			Fundamentals of Machine Learning for Predictive Data					Expert Foundation				
			Analytics, MIT Press									
1001	n/a	Aug. 2017	Liu, Yu-Hsin, Jeffrey Prince, and				G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
			Scott Wallsten, "Distinguishing Bandwidth and Latency in					Explain Operation of the Technologies, Expert Foundation				
			Households' Willingness-to-Pay	,								
1002	n/a	2016	for Broadband Internet Speed"  Miao, Jianyu, and Lingfeng Niu,	, n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
			"A Survey on Feature Selection,"	,,				Explain Operation of the Technologies,				
			Procedia Computer Science, Vol 91, pp. 919-926	L.				Expert Foundation				
1003	n/a	11/7/2021	Northcutt, Curtis G., Anish	n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
			Athalye, and Jonas Mueller, "Pervasive Label Errors in Test					Explain Operation of the Technologies, Expert Foundation				
			Sets Destabilize Machine					Expert i oundation				
			Learning Benchmarks," 35th Conference on Neural									
			Information Processing Systems									
			Track on Datasets and									
1004	n/a	2024	Benchmarks William H. Clark, IV and Alan J	J. n/a			G. Zervas	Relevant to Absence of Eavesdropping,	-		-	
	1		Michaels, "Training from Zero:					Explain Operation of the Technologies,				
			Radio Frequency Machine Learning Data Quantity					Expert Foundation				
	1		Forecasting"									

Filing Order	Starting Bates No.	Document Dat	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1005	n/a	3/24/2023	Advisory Board, "IBM's Watson recommended 'unsafe and incorrect' treatments for cancer patients, investigation reveals," https://www.advisory.com/dailyb riefing/2018/07/27/ibm				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation				
1006	n/a	6/3/2024 (accessed)	Branch, "Advertising Identifiers for Attribution," https://help.branch.io/usingbrancl /docs/advertising-identifiers-for- attribution, accessed June 3, 2024	h			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1007	n/a	6/28/2024 (accessed)	Branch, "IP Addresses," https://www.branch.io/glossary/ip addresses/, accessed June 28, 2024	n/a p-			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1008	n/a	6/28/2024 (accessed)	Butvinik, Danny, "Feature Selection – All You Ever Wanted To Know," KDnuggets, https://www.kdnuggets.com/2021 /06/feature-selection- overview.html, accessed June 28, 2024	ı			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1009	n/a	4/25/2013	Cutler, Kim-Mai, and Josh Constine, "Facebook Buys Parse To Offer Mobile Development Tools As Its First Paid B2B Service," TechCrunch, https://techcrunch.com/2013/04/2 5/facebook-parse/, accessed June 28, 2024	2			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1010	n/a	6/16/2023 (accessed)	Epoch Converter, "Unix Timestamp Converter," https://www.epochconverter.com , accessed June 16, 2023	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1011	n/a	4/20/2023 (accessed)		d			A. Lapitski; G. Zervas; E. Dendievel; F. Leach; T. Frantsuzenko	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1012	n/a	6/27/2023 (accessed)	Meta, "AppEventsLogger - Meta for Developers," https://developers.facebook.com/ ocs/reference/android/current/cla- s/AppEventsLogger/, accessed June 27, 2023	d			A. Lapitski; G. Zervas; E. Dendievel; F. Leach	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1013	n/a	3/2/2017	Meta, "AppEvaleak Machine, as of March 2, 2017, https://web.archive.org/web/2017 0302173441/https://developers.fa cebook.com/docs/reference/andre id/current/class/AppEventsLogge r.FlushBehavior/, accessed June 24, 2024	7 7 a a b c :			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation				
1014	n/a	6/12/2023 (accessed)	Meta, "Facebook SDK for Android Downloads - Meta for Developers," https://developers.facebook.com/oos/android/downloads/, accessed June 12, 2023	n/a d d			G. Zervas; T. Wooldridge	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1015	n/a	6/27/2024 (accessed)	mitmproxy, "Certificates," https://docs.mitmproxy.org/stable /concepts-certificates/, accessed June 27, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	
1016	n/a	6/27/2024 (accessed)		n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-	

Joint Preliminary Tr	rial Exhibit List
Frasco v. Flo Health, Inc., et al. (0	Case No. 3:21-cv-00757-JD)

Filing Order	Starting Bates No.	Document Dat	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
1017	n/a	8/7/2018	NortonLifeLock, "What does a VPN hide?," https://us.norton.com/blog/privac y/how-a-vpn-can-help-hide-your- search-history, accessed June 28, 2024		THE STATE OF THE S		G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-		
1018	n/a	4/2/2018	Redman, Thomas C., "If Your Data Is Bad, Your Machine Learning Tools Are Useless," Harvard Business Review, https://hbr.org/2018/04/if-your- data-is-bad-your-machinelearning tools-are-useless	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation					
1019	n/a	4/26/2023	Samanta, Orvill, "What is an Android ID? (AAID)," Priori Data, https://prioridata.com/glossary/an droid-id, accessed June 3, 2024	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-		
1020	n/a	4/26/2021	Smith, Rebecca, "What is IDFA and why is this iOS update important?," Mozilla, https://blog.mozilla.org/en/internet-culture/turn-off-idfa-for-apps- apple-ios-14-5, accessed June 3, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-		
1021	n/a	5/27/2022	Townshend, Pete, "Browser fingerprinting: Everything you need to know," https://smartframe.io/blog/browser-fingerprinting-everything-you- need-to-know/	n/a			G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-		
1022	n/a	6/28/2024 (accessed)	Yahoo, "Data Storage and Anonymization," https://legal.yahoo.com/us/en/yah oo/privacy/topics/datastorage/ind ex.html, accessed June 28, 2024				G. Zervas	Relevant to Absence of Eavesdropping, Explain Operation of the Technologies, Expert Foundation	-		-		
1023	n/a	Varied	Index of news articles, ranging in date from February 22, 2019 to September 14, 2019, with follow on stories to the Wall Street Journal article	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		N/A	-		
1024	n/a	2/22/2019	Feiner, Lauren, "Facebook reportedly gets deeply personal info, such as ovulation times and heart rate, from some apps," CNBC	n/a			Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.	-		
1025		2/23/2019	Associated Press, "Apps quietly sharing users' data: Informatiaon, such as timing of menstrual cycles, is being sent to Facebook without consent, a report says.," Los Angeles Times				S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen	defense	defense.	-		
1026	n/a	2/26/2019	Sumagaysay, Levi, "Some Apps Stop Sharing Sensitive User Data With Facebook After Practice Exposed Heart Rates, Menstrual Cycles, Weight Among Private Information Divulged," San Jose Mercury News				Plaintiffs; A. Dahiya; S. Satterfield	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.			
1027	n/a	n/a	Any documents listed on another party's list	n/a			n/a	See purposes as to the underlying documents	Plaintiffs incorporate their challenges to the admissibility of the underylying documents.	Do we need anything here?	-		
1028	n/a	n/a	Any other publicly available news articles, blog posts, and app reviews concerning whether Flo shared data with Google and/or Meta	n/a			n/a	See purposes as to the underlying documents	Plaintiffs incorporate their challenges to the admissibility of the underylying documents.	Do we need anything here?	-		

Filing Order	Starting Bates No.	Document Da	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response	
1029	n/a	n/a	Any rebuttal and/or impeachment documents	n/a			n/a		Not relevant to any claim or defense		-		
1030	n/a		Plaintiff Tesha Gamino's	Confidential			T. Gamino		Not relevant to any claim or		-		
			Objections and Responses to Defendants' (Meta Platforms,						defense; outside class period				
			Inc., Google LLC, and Flurry,										
			LLC) First Set of Interrogatories										
1031	n/a		to Plaintiff Tesha Gamino Plaintiff Sarah Wellman's	Confidential			S. Wellman		_		_		
			Objections And Responses To										
			Defendants' (Meta Platforms, Inc., Google LLC, And Flurry,										
			LLC) First Set Of Interrogatories										
			To Plaintiff Sarah Wellman										
1032	n/a	Forthcoming	Declaration of Karan Shah (in	n/a			K. Shah; A. Lapitski	Relevant to Absence of Eavesdroppin	ng Not relevant to any claim or	Relevant to witness	-		
		_	lieu of testimony if the parties						defense	credibility and CIPA 632			
1033	n/a	1/23/2020	agree) USA Today, Trying to get	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to	o Not relevant to any claim or	claim.  Relevant to SOL affirmative	_		
			pregnant using a menstrual				Dahiya	Failure to Mitigate, Relevant to Cons		defense, even if outside class			
			tracker app? This is what happens to your health data,							period.			
			available at										
			https://www.usatoday.com/story/tech/2020/01/23/period-tracker-	:									
			apps-privacy-										
			concerns/4546797002/?utm_sour										
			ce=feedblitz&utm_medium=feed blitzrss&utm_campaign=usatoda										
			y-techtopstories										
1034	n/a	1/22/2020	Yahoo News, What Your Period Tracker App Knows About You,				S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Cons			-		
			available at				Dainya	rantic to writigate, recevant to cons	ciri delense, outside class period	period.			
			https://www.yahoo.com/news/per iod-tracker-app-knows-										
			110002532.html										
1035	n/a	12/17/2019	Refinery 29, Using A Period	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to			-		
			Tracking App? This Is Where All Your Personal Info Goes,				Dahiya	Failure to Mitigate, Relevant to Cons	ent defense; outside class period	period.			
			available at										
			http://www.refinery29.com/en- gb/period-tracking-apps-personal	_									
			data										
1036	n/a	7/24/2019	MoonCup, Period tracker apps: when technology met	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Cons			-		
			menstruation, available at				Damya	randre to Mingate, resevant to cons	em derense, oanside emiss period	period.			
			https://wearemooncup.com/blogs/ the-bloody-bulletin/period-tracke										
			apps-when-technology-met-										
			menstruation?srsltid=AfmBOopE zVrQzW-										
			MG5woMzjI09CbVnHqeE9hNy										
			6WEVbBUlBKL3ot5wru										
1037	n/a	6/7/2019	Medium, Sadaf Khan, Data	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to	o Not relevant to any claim or	Relevant to SOL affirmative	_		
			bleeding everywhere: a story of				Dahiya	Failure to Mitigate, Relevant to Cons		defense, even if outside class			
			period trackers, available at https://deepdives.in/data-bleeding	_						period.			
			everywhere-a-story-of-period-										
1038	n/a	6/4/2019	trackers-8766dc6a1e00 MedTech Drive, Apple Watch's	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to	o Not relevant to any claim or	Relevant to SOL affirmative	_		
1000	200		newest health addition: menstrual				Dahiya	Failure to Mitigate, Relevant to Cons		defense, even if outside class			
			cycle tracking, available at https://www.medtechdive.com/ne							period.			
			ws/apple-watchs-newest-health-										
			addition-menstrual-cycle- tracking/556072/										
L	+	1	u acking/3300/2/	1		+	_	1		ļ	ļ	<u> </u>	

Filing	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
1039	n/a	3/28/2019	Wall Street Journal Pro,	n/a	witness		S. Satterfield; A.	Relevant to SOL Defense, Relevant to	Not relevant to any claim or	Palayant to SOL affirmativa		
1037	ii a	3/20/2017	CyberSecurity, Cyber Daily:	ir a			Dahiya	Failure to Mitigate, Relevant to Conser				
			Personal Data Isn't Your Own;				Daniya	andre to winigate, relevant to conser	defense, outside class period	period.		
			Australian Cyber War; Workers							period.		
			Sue Over Biometrics Collection									
1040	n/a	3/27/2019	Wall Street Journal, Medical	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to	Not relevant to any claim or	Relevant to SOL affirmative	-	
1			Apps Routinely Share User				Dahiya	Failure to Mitigate, Relevant to Conser				
			Health Data, Study Shows;					9 /		period.		
			Nearly 80% of apps examined									
			share data with third parties,									
			according to new research,									
			available at									
			https://www.wsj.com/articles/me	d								
			ical-apps-routinely-share-user-									
			health-data-study-shows-									
			11553723652									
1041	n/a	3/21/2019	The New Daily, Data sharing by	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to				
			popular health apps found to be				Dahiya	Failure to Mitigate, Relevant to Conser	t defense; outside class period			
			'routine', available at							period.		
			https://www.thenewdaily.com.au									
			life/tech/2019/03/21/health-apps- data-share	•								
1042	,	3/5/2019	MarketWatch, Fitness and health	1			S. Satterfield; A.	D.I COLD.C. D.I	No. 1	D. I COI		
1042	n/a	3/5/2019	apps may be sharing the most	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Conser			-	
			private details about your life;				Dalilya	randre to writigate, Relevant to Consei	it defense, outside class period	period.		
			There's not enough oversight for							period.		
			apps that track everything from									
			people's fitness routines to their									
			menstrual cycles, bioethicists say	,								
			available at									
			https://www.marketwatch.com/st	:								
			ory/fitness-and-health-apps-may-									
			be-sharing-the-most-private-									
			details-about-your-life-2019-02-									
			26									
1043	n/a	3/1/2019	American Health Line, Your	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to				
			iPhone might be secretly sharing				Dahiya	Failure to Mitigate, Relevant to Conser	t defense; outside class period			
			private health data with Facebool	k						period.		
1011	,		m	,			0.0 0.11			n 1		
1044	n/a	2/28/2019	The HIPAA Guide, Third-Party				S. Satterfield; A.	Relevant to SOL Defense, Relevant to			-	
			Apps' Health Data Sharing With				Dahiya	Failure to Mitigate, Relevant to Conser	it defense	defense.		
			Facebook Investigated, available									
			https://www.hipaaguide.net/third	_								
			party-apps-health-data-sharing-									
			with-facebook-investigated/									
1045	n/a	2/28/2019	Serendipity 35, Even Facebook	n/a	+		S. Satterfield; A.	Relevant to SOL Defense, Relevant to	Not relevant to any claim or	Relevant to SOL affirmative	-	
1			Wishes it Could Clear its History				Dahiya	Failure to Mitigate, Relevant to Conser		defense.		
			available at									
			https://serendipity35.net/index.ph									
			p?/archives/3553-even-facebook-									
			wishes-it-could-clear-its-									
			history.html		1							
1046	n/a	2/27/2019	iCrowdNewswire, Apps makers	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to			-	
			are sharing sensitive personal				Dahiya	Failure to Mitigate, Relevant to Conser	t defense	defense.		
			information with Facebook but									
			not telling users									
1047	n/a	2/27/2019	Newsroom, Apps give Facebook	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to			[-	
			sensitive data, available at				Dahiya	Failure to Mitigate, Relevant to Conser	it derense	defense.		
			https://newsroom.co.nz/2019/02/									
			27/apps-give-facebook-sensitive-	1								
			uata/									
	1		1	1	-1	1	1	1	1	1		

Filing Starting Bates No. Order	Document Da	te Document Description Confide Designa		Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response Defendants' Objections Plaintiffs' Response
1048 n/a	2/26/2019	San Jose Mercury News, Some Apps Stop Sharing Sensitive User Data with Facebook After Practice Exposed; Heart Rates, Menstrual Cycles, Weight Among Private Information Divulged, available at https://www.mercurynews.com/2 019/02/25/some-apps-stop- sharing-sensitive-user-data-with- facebook-after-practice-exposed/	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1049 n/a	2/25/2019	The East Bay Times, Some apps stop sharing sensitive user data with Facebook after practice exposed, available at https://www.castbaytimes.com/20 19/02/25/some-apps-stop-sharing- sensitive-user-data-with-facebook- after-practice-exposed/			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1050 n/a	2/25/2019	Hot Hardware, These Popular Health And Fitness Apps Shared Highly Personal Data With Facebook, available at https://hothardware.com/news/he alth-apps-stop-sharing-data-with- facebook			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1051 n/a	2/25/2019	Cool Mom Tech, Are your favorite apps sharing your personal data with Facebook, even if you're not on Facebook? The answer is yes., available at https://coolmomtech.com/2019/02/favorite-apps-sharing-personal-data-with-facebook/			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense:
1052 n/a	2/25/2019	Fox News, Popular apps cease sharing data with Facebook, available at https://www.foxnews.com/tech/popular-apps-cease-sharing-data-with-facebook			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1053 n/a	2/25/2019	CE Noticias Financieras, Several mobile applications stop sharing sensitive information from users with Facebook			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1054 n/a	2/25/2019	Stuff, Facebook quietly collects sensitive data from apps - report, available at https://www.stuff.co.nz/business/ 110859613/Facebook-quietly- collects-sensitive-data-from-apps- report			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1055 n/a	2/25/2019	Tech Juice, These apps are sharing your personal data with Facebook, available at https://www.techjuice.pk/these-apps-are-sharing-your-personal-data-with-facebook/			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.
1056 n/a	2/25/2019	Smays.com, More apps caught sending personal info to Facebook, available at https://www.smays.com/2019/02/ios-facebook/			Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen	t defense	defense.
1057 n/a	2/25/2019	The Life's Truth, Smartphone Apps shares personal data with Facebook, available at https://abdhuraf.wordpress.com/2 019/02/25/smartphone-apps-shares-personal-data-with-facebook/			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		Relevant to SOL affirmative defense.

Filing		Document Date	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
1058	n/a	2/25/2019	Edge Media Network, Report:	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to		Relevant to SOL affirmative	-	
			Apps Give Facebook Sensitive				Dahiya	Failure to Mitigate, Relevant to Consen	defense	defense.		
			Health and Other Data, available									
			at https://www.edgemedianetwork.c									
			om/story/272777									
1059	n/a	2/25/2019	Daze Info, Popular iOS Apps Are	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to	Not relevant to any claim or	Relevant to SOL affirmative	_	
1037	15 4	2/25/2019	Sharing Sensitive User Data With				Dahiya	Failure to Mitigate, Relevant to Consen		defense.		
			Facebook, available at				,	2 /				
			https://dazeinfo.com/2019/02/25/									
			popular-ios-apps-sharing-user-									
1000	,	2 2 4 2 2 4 2	data-facebook/							B. 1		
1060	n/a	2/24/2019	Wall Street Journal, Eleven Popular Apps That Shared Data	n/a			S. Satterfield; A. Dahiya	Relevant to SOL Defense, Relevant to Failure to Mitigate, Relevant to Consen		defense.	-	
			With Facebook ; Five have				Daniya	Failure to Mitigate, Relevant to Consen	detense	derense.		
			ceased doing so after being									
			contacted by The Wall Street									
			Journal, available at									
			https://wsj.com/articles/eleven-									
			popular-apps-that-shared-data-									
			with-facebook-11551055132									
1061	n/a	2/24/2019	Eureka Times-Standard, Report	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to			-	
			shows apps send sensitive user data to Facebook				Dahiya	Failure to Mitigate, Relevant to Consen	detense	defense.		
1062	n/a	2/24/2019	The Bismarck Tribune, Report:	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to	Not relevant to any claim or	Relevant to SOL affirmative		
1002	12 4	2.2 0.2019	Apps give Facebook sensitive				Dahiya	Failure to Mitigate, Relevant to Consen		defense.		
			health, other data				,	2 /				
1063	n/a	2/24/2019	Bru Direct, Multiple Ios Apps	n/a			S. Satterfield; A.	Relevant to SOL Defense, Relevant to			-	
			Are Reportedly Sharing Sensitive	;			Dahiya	Failure to Mitigate, Relevant to Consen	defense	defense.		
1061	,		Data With Facebook							n		
1064	n/a	2/24/2019	Financial Express Online, Facebook in the dock over app	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
			that reveals period dates of its				Daniya		detense	derense.		
			users, available at									
			https://www.financialexpress.com	n								
			/life/technology-facebook-									
			slammed-privacy-norms-violation	1-								
			accesses-personal-info-like-									
			weight-ovulation-status-using- third-party-apps-									
			1497069/#:~:text=Among%20the									
			se%20included%20Flo%20Perio									
			d,it%20%E2%80%9Cprohibits%									
			20app%20developers%20from									
1065	n/a	2/24/2019	Valley News Live, Use an app to				S. Satterfield; A.		Not relevant to any claim or		-	
		1	track your period? That data and	1			Dahiya		defense	defense.		
			more could end up with									
			Facebook, WSJ reports, available									
			https://web.archive.org/web/2019	,								
		1	0224192625/https://www.valleyn									
			ewslive.com/content/news/use-an-									
			app-to-track-your-period-that-									
		1	data-and-more-could-end-up-with	1-								
			facebook-wsj-reports- 506291911.html									
1066	n/a	2/24/2019	The intersection of Technology	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative		
1000	iv a	212412U17	and Humanity, Ken Garen CPA,	iv a			Dahiya		defense	defense.	_	
		1	You Give Apps Sensitive	1			zamya		Gerense	derelise.		
			Personal Information. Then They									
			Tell Facebook'This is a big									
		1	mess,' available at	1								
			https://ubcckengaren.blogspot.co									
			m/2019/02/you-give-apps- sensitive-personal.html									
L	1	1	scusitive-personal.html	1		1		1	1			

Filing	Starting Bates No.	Document Dat	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response Defendants' Objections Plaintiffs' Response
Order	Starting bates No.	Document Dat	e Document Description	Designation	Sponsoring	Framums Exhibit Furpose	Sponsoring Witness	Defendants Exhibit Furpose	Framenis Objections	Defendants Response Defendants Objections Framitins Response
1067		2/24/2010	District of W. II	,	Witness		0.0 5.11 4		No. 1	
1067	n/a	2/24/2019	Digital Information World, Various Android and iOS apps	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.
			are sharing health data with				Dailiya		defense	ucicisc.
			Facebook, without user consent,							
			available at							
			https://www.digitalinformationwo	,						
			rld.com/2019/02/you-give-apps-							
			your-data-then-they-tell-							
			facebook.html							
1068	n/a	2/24/2019		n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative -
			Apps Sending "Intensely Personal	1			Dahiya		defense	defense.
			Information" To Facebook,							
			Whether Or Not You Have An							
			Account, available at							
			https://ghovexx.blogspot.com/201							
			9/02/smartphone-apps-sending- intensely.html#main							
			intensery.htmi#mam							
1069	n/a	2/23/2019	The Lethbridge Herald, Phone	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative -
			apps giving data to Facebook:				Dahiya		defense	defense.
			report; Developers USE Info To				*			
			Target Users While On The Site							
1070	n/a	2/23/2019		n/a			S. Satterfield; A.			Relevant to SOL affirmative -
			Report warns apps send sensitive				Dahiya		defense	defense.
			user data to Facebook							
1071	n/a	2/23/2019		n/a			S. Satterfield; A.			Relevant to SOL affirmative -
			Facebook sensitive health, other data: report, available at				Dahiya		defense	defense.
			https://www.seattletimes.com/bus							
			iness/report-apps-send-sensitive-							
			user-data-to-facebook/							
1072	n/a	2/23/2019		n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative -
			some apps are sharing private				Dahiya		defense	defense.
			health details with Facebook,				-			
			available at							
			https://bgr.com/business/facebook							
			health-data-personal-details-apps/	/						
1050			D	,						
1073	n/a	2/23/2019	Boston Herald, Report: Apps feeding sensitive data to	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative - defense.
			Facebook				Daniya		defense	detense.
1074	n/a	2/23/2019	Monterey County Herald, Report:	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative -
10/4	12.00	2.23/2017	Apps send sensitive user data to				Dahiya		defense	defense.
			Facebook							
1075	n/a	2/23/2019	Telegraph Herald, Report: Apps	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative -
			give Facebook sensitive health				Dahiya		defense	defense.
			data							
1076	n/a	2/23/2019		n/a			S. Satterfield; A.			Relevant to SOL affirmative  -
			Facebook Harvesting User Data				Dahiya		defense	defense.
			From Heart Rate, Ovulation iOS							
			Apps,							
			https://www.ibtimes.com/faceboo k-harvesting-user-data-heart-rate-							
			ovulation-ios-apps-2767445							
1077	n/a	2/23/2019	Los Angeles Times, Several apps	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative -
			funnel users' sensitive data to				Dahiya		defense	defense.
			Facebook without consent, report							
			says,							
			https://www.latimes.com/business	3						
			/technology/la-fi-tn-apps-							
			facebook-private-data-20190222- story.html	1						
		l	эког улиши	1	1		1	I.		

	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
1078	n/a	2/23/2019	The Guardian, Facebook attacked	n/a			S. Satterfield; A.		Not relevant to any claim or		-	
			over app that reveals period dates				Dahiya		defense	defense.		
			of its users; Sensitive data sent to									
			social media giant from 'at least									
			11' platforms, available at									
			https://www.theguardian.com/tec									
			hnology/2019/feb/23/facebook-									
			app-data-leaks									
1079	n/a	2/23/2019	Daily News of Los Angeles,	n/a			S. Satterfield; A.		Not relevant to any claim or	Delevent to COL offinnative		
10/9	II/ a	2/23/2019	Apps give Facebook sensitive	II/a			Dahiya		defense	defense.	-	
			health data				Damya		delense	defense.		
1080	n/a	2/23/2019		n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			Corporation, Facebook under fire				Dahiya		defense	defense.		
			over claims it knows when users				_					
			are having their periods,									
			https://www.abc.net.au/news/201									
			9-02-24/facebook-under-fire-over-									
			report-its-accessing-your-									
1001	-1-	2/22/2010	personal-info/10844156		1		S. Satterfield; A.		Not aslamatical 1.1	Delements COT OF 1		
1081	n/a	2/23/2019	Axios, Facebook tracks highly personal details through apps,	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	defense.	-	
			available at				Daniya		defense	derense.		
			https://www.axios.com/2019/02/2									
			3/facebook-tracks-personal-data-									
			through-apps									
1082	n/a	2/23/2019		n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			Give Facebook Sensitive Health				Dahiya		defense	defense.		
			Data									
1083	n/a	2/23/2019		n/a			S. Satterfield; A.		Not relevant to any claim or		-	
			private health info; Inclduing				Dahiya		defense	defense.		
1001	,	0.000.000	whether women ovulating							n 1		
1084	n/a	2/23/2019	The Observer, Facebook attacked				S. Satterfield; A. Dahiya		Not relevant to any claim or defense	defense.	-	
			over app that reveals period dates of its users				Daniya		detense	derense.		
1085	n/a	2/23/2019		n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			health data to Facebook - News				Dahiya		defense	defense.		
			Digital: Mobile, available at				,					
			https://vaaju.com/switzerland/app									
			s-sends-sensitive-health-data-to-									
			facebook-news-digital-mobile/									
1086	n/a	2/23/2019	Euro News, Some apps send data				S. Satterfield; A.			Relevant to SOL affirmative	-	
			about menstruation, home buying to Facebook, WSJ reports,				Dahiya		defense	defense.		
			available at									
			https://www.euronews.com/2019/									
			02/22/some-apps-send-data-about-									
			menstruation-home-buying-									
			facebook-wsj-n974711									
1087	n/a	2/23/2019		n/a			S. Satterfield; A.			Relevant to SOL affirmative	-	
			Being Sent Sensitive User Data				Dahiya		defense	defense.		
			by Several Apps: Report,									
			available at									
			https://iwebguyblog.wordpress.co									
			m/2019/02/23/facebook-being- sent-sensitive-user-data-by-									
			several-apps-report/#post-17139									
			арро герого провет / 139									
1088	n/a	2/23/2019	John Brown's Notes and Essays,	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			You Give Apps Sensitive				Dahiya		defense	defense.		
			Personal Information. Then They				-					
			Tell Facebook., available at									
			https://johnbrownnotesandessays.									
			blogspot.com/2019/02/you-give-									
1000	,	2/22/2012	apps-sensitive-personal.html	7	1		0.0 5		No. 1	D.I GGY OT		
1089	n/a	2/22/2019	Postmedia Breaking News, Report: Apps send sensitive user	n/a			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	-	
			data to Facebook				Daniya		uciciisc	uciciisc.		
L	l .	1	unii to i accoor		1	1	1	1	1	1		

### Case 3:21-cv-00757-JD Document 659-1

### Filed 06/13/25 Page 109 of 115

Filing Order	Starting Bates No.	Document Dat	e Document Description	Confidentiality Designation	Plaintiffs' Plaintiffs' Exhibit Purp Sponsoring Witness	ose Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections Plaintiffs' Response
1090	n/a	2/22/2019	says it will stop sharing health data with Facebook, available at https://mashable.com/article/flo- period-tracking-app-will-stop- sharing-data-with-facebook	n/a	TAIRES	S. Satterfield; A. Dahiya		Not relevant to any claim or defense	defense.	
1091	n/a	2/22/2019	Associated Press, Report: Apps give facebook sensitive health, other data, available at https://apnews.com/article/a3f5a3 a5663b49c4b909da1353ce03da			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	
1092	n/a	2/22/2019	Mail Online, How Facebook harvests your personal data from popular apps: At least a dozen popular apps secretly share 'highly sensitive' data without users' consent, available at https://www.dailymail.co.uk/scie neetech/article- 6734805/Facebook-secretly- collects-highly-sensitive-data- popular-apps.html	n/a		S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	
1093	n/a	2/22/2019	The Denver Post, Report: Apps send sensitive user data to Facebook without their consent, available at https://www.denverpost.com/201 9/02/22/facebook-apps-send- sensitive-data/amp/	n/a		S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	
1094	n/a	2/22/2019	CNET, Facebook receives personal info like your heart rate from popular apps, available at https://www.enet.com/tech/servic es-and-software/facebook- receives-personal-info-like-your- heart-rate-from-popular-apps/	n/a		S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	
1095	n/a	2/22/2019	Business Insider, Apps are reportedly telling Facebook how much users weigh and when they're menstruating (FB), available at https://www.businessinsider.com/ facebook-sensitive-data-apps- 2019-2	n/a		S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	
1096	n/a	2/22/2019	MacRumors, Some iOS Apps Sending an Alarming Amount of Data to Facebook and Most Users Are Unaware, available at https://www.macrumors.com/201 9/02/22/ios-apps-sending-private- data-to-facebook/			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	defense.	
1097	n/a	2/22/2019	Canadian Press, Report: Apps give Facebook sensitive health and other data	n/a		S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	
1098	n/a	2/22/2019	iPhone in Canada, Popular iOS Apps are Stealing Your Private Data via Facebook SDK: WSJ, available at https://www.iphoneincanada.ca/2 019/02/22/apps-stealing-private- data-via-facebook/			S. Satterfield; A. Dahiya		defense	Relevant to SOL affirmative defense.	
1099	n/a	2/22/2019	Mail Online, WHAT APPS ARE SHARING YOUR DATA WITH FACEBOOK?, available at https://www.dailymail.co.uk/scie ncetech/fb-6735041/WHAT- APPS-SHARING-DATA- FACEBOOK.html			S. Satterfield; A. Dahiya		Not relevant to any claim or defense	Relevant to SOL affirmative defense.	

Filing	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
1100	n/a	2/22/2019	CBS News, Facebook reportedly	n/a	withess		S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			received users' sensitive health				Dahiya		defense	defense.		
			data from apps: "It's incredibly									
			dishonest", available at									
			https://www.cbsnews.com/news/f									
			acebook-reportedly-received- sensitive-health-data-from-apps-									
			without-consent/									
			William College									
1101	n/a	2/22/2019	NBC News, Use an app to track	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			your period? That data and more				Dahiya		defense	defense.		
			could end up with Facebook,									
			WSJ reports, available at									
			https://www.nbcnews.com/tech/te ch-news/some-apps-send-data-									
			about-menstruation-home-buying-									
			facebook-wsj-n974711									
1102	n/a	2/22/2019	CNBC, Facebook reportedly gets	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			deeply personal info, such as				Dahiya		defense	defense.		
			ovulation times and heart rate,									
			from some apps, available at									
			https://www.cnbc.com/2019/02/2 2/facebook-receives-personal-									
			health-data-from-apps-wsj.html									
1103	n/a	2/22/2019	Yahoo, Multiple iOS apps are	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
1			reportedly sharing sensitive data				Dahiya		defense	defense.		
			with Facebook, available at				,					
			https://sg.finance.yahoo.com/new									
			s/2019-02-22-facebook-data-									
			sharing-body-weight-									
			period.html?guccounter=1&guce_ referrer=aHR0cHM6Ly93d3cuZ	-								
			29vZ2xlLmNvbS8&guce_referre									
		ı	r_sig=AQAAAMJ1RH2XKw_X									
			DWlss92qRMylO0A3evaVAGY									
			gNKm2o_O0GHlO85Tymgk-									
			wRVL5hfFpVjciN72XSG6-									
			P5SfrDywSCTAfFFRnUx5LmbP									
			QX2OXVtQIc8zkf9Ma_apIAfM									
			v7Bnhfjihs0_LGunKxLl38xiw8 MszJKCsjXaAUojvsTFtcc									
			MSZJKCSJAAOOJVSTFICE									
1104	n/a	2/22/2019	EnGadget, Multiple iOS apps are	n/o			S. Satterfield; A.		Not relevant to any claim or	Palazant to SOL affirmativa		
1104	II a	2/22/2019	reportedly sharing sensitive data	iv a			Dahiya		defense	defense.		
			with Facebook (updated),				,-					
			available at									
			https://www.engadget.com/2019-									
			02-22-facebook-data-sharing-									
			body-weight-period.html									
1105	n/a	2/22/2019		n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			Apps Are Sharing Sensitive Data with Facebook, available at				Dahiya		defense	defense.		
			https://www.scrippsnews.com/sci									
			ence-and-tech/social-media/apps-									
			share-sensitive-data-with-									
			facebook-not-telling-users									
1106	n/a	2/22/2019		n/a			S. Satterfield; A.			Relevant to SOL affirmative	-	
			popular apps are secretly giving				Dahiya		defense	defense.		
			your private data to Facebook,									
			available at https://androidifying.blogspot.co									
			m/2019/02/at-least-11-popular-									
			apps-are-secretly.html									
1107	n/a	2/22/2019	Android Authority, At least 11	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			popular apps are secretly giving				Dahiya		defense	defense.		
			your private data to Facebook,									
			available at									
			https://www.androidauthority.co									
			m/facebook-partner-apps-privacy- 957694/	1								
			73 / 074/		1			1		1	1	1

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order				Designation	Sponsoring Witness		Sponsoring Witness					
1108	n/a	2/22/2019	New Orleans City Business,	n/a	Withess		S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			Report: Apps give Facebook				Dahiya		defense	defense.		
			sensitive health and other data,									
			available at https://neworleanscitybusiness.co									
			m/blog/2019/02/22/report-apps-									
			give-facebook-sensitive-health-									
			and-other-data/									
1109	n/a	2/22/2019	9To5Mac, Popular apps caught	n/a			S. Satterfield; A.		Not relevant to any claim or	Relevant to SOL affirmative	-	
			secretly sending health data and				Dahiya		defense	defense.		
			more to Facebook, should Apple									
			intervene?, available at https://9to5mac.com/2019/02/22	(e								
			acebook-personal-data-ios-apps/									
			accoon personal data los apps									
1110	n/a	n/a	S. Wellman Poshmark Site	n/a			S. Wellman				-	
1111	n/a	n/a	T. Gamino Threads Post	n/a			T. Gamino		Authenticity	Authenticity to be established	-	
										by testimony from Tesha		
	,						m o i			Gamino.		
1112	n/a	n/a	Docket, Gamino v. Thinx Inc.	n/a			T. Gamino		Not relevant to any claim or defense	Relevant to witness credibility.	-	
1113	n/a	1/22/2024	Complaint, Gamino v. Thinx Inc.	n/a			T. Gamino		Not relevant to any claim or		_	
1115	12 4	1,22,202	Compania, Guillio V. Timis Inc.				1. Guillio		defense; outside class period			
										class period.		
1114	n/a	5/16/2024	Answer, Gamino v. Thinx Inc.	n/a			T. Gamino		Not relevant to any claim or		-	
									defense; outside class period			
	,						m o i			class period.		
1115	n/a	n/a	Docket, Gamino v. Spin Master Inc. and the Maya Group	n/a			T. Gamino		Not relevant to any claim or defense	Relevant to witness credibility.	-	
1116	n/a	10/31/2023	Complaint, Gamino v. Spin	n/a			T. Gamino		Not relevant to any claim or		_	
			Master Inc. and the Maya Group						defense; outside class period			
									•	class period.		
1117	n/a	n/a	Docket, Gamino v. Google LLC	n/a			T. Gamino		Not relevant to any claim or		-	
1110		4/0/2024					m o .		defense	credibility.		
1118	n/a	4/9/2024	Complaint, Gamino v. Google LLC	n/a			T. Gamino		Not relevant to any claim or defense; outside class period		-	
			ELC						defense, outside class period	class period.		
1119	n/a	3/18/2025	Mya Abraham, "Sarunas Jackson	n n/a			T. Gamino		Not relevant to any claim or		-	
			Breaks Silence on Abuse Claims	:					defense; undue prejudice;	credibility and CIPA 632		
			From Ex-Girlfriend," VIBE						outside class period	claim, even if outside class		
										period; relevance and		
										probative value outweigh any undue prejudice, confusion,		
										or risk of misleading jury.		
										or risk or misicading jury.		
1120	n/a	3/16/2025	Xaviera Bryant, "Not Again?!	n/a			T. Gamino		Not relevant to any claim or	Relevant to witness	-	
			Sarunas Jackson Accused Of						defense; undue prejudice;	credibility and CIPA 632		
			Abuse & Toxic Behavior By His						outside class period	claim, even if outside class		
			Ex-Girlfriend Brittney Bell," Ice Cream Conversations	•						period; relevance and probative value outweigh any		
			Cream Conversations							undue prejudice, confusion,		
										or risk of misleading jury.		
1121	n/a	3/16/2025	Sarunas Jackson Accused Of	n/a			T. Gamino		Not relevant to any claim or		-	
			Abuse & Cheating, Baby Mama						defense; undue prejudice;	credibility and CIPA 632		
			DomiNque Perry Co-Signs His	.]					outside class period	claim, even if outside class		
			Ex-Girlfriend & Claims 'Insecure Actor Mocked Their Daughter's							period; relevance and probative value outweigh any		
			Actor Mocked Their Daughter's Autism							undue prejudice, confusion,		
			rutisiii							or risk of misleading jury.		
										2,,.		
1122	n/a	n/a	Docket, Gamino v. Jones	n/a			T. Gamino		Not relevant to any claim or		-	
44							m. c		defense	credibility.		
1123	n/a	5/18/2023	Complaint, Gamino v. Jones	n/a			T. Gamino		Not relevant to any claim or		-	
									defense; outside class period	credibility, even if outside class period.		
1124	n/a	1/12/2024	Court Order, Gamino v. Jones	n/a			T. Gamino		Not relevant to any claim or		_	
			, _ammo v. vones	1					defense; outside class period			
L										class period.		

Filing	Starting Bates No.	Document Dat	e Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Order	Starting Dates 100.	Document Date	Bocument Description	Designation	Sponsoring Witness	Tankins Exmon rui posc	Sponsoring Witness	Detendants Exhibit Ful post	Transcris Objections	Detendants Response	Decemants Objections	a minute response
1125	META-FRASCO-	6/9/2016	Facebook Offline Conversions	Confidential								
	0000000001 through META-FRASCO-		Beta Terms, date of last revision June 9, 2016									
	0000000003		June 9, 2016									
1126	META-FRASCO-	4/17/2017	Facebook Offline Conversions,	Confidential								
	0000000007 through META-FRASCO-		date of last revision April 17, 2017									
	0000000009		2017									
1127	META-FRASCO-	9/29/2017	Facebook Offline Conversions,	Confidential								
	0000000013 through META-FRASCO-		date of last revision September 29, 2017									
	0000000015		29, 2017									
1128	META-FRASCO-	4/8/2019	Facebook Business Tools Terms									
	0000002944 through META-FRASCO-		date of last revision April 8, 201	7								
	0000002946											
1129	META-FRASCO-	12/26/2019	Facebook Business Tools Terms.	, Confidential								
	0000002947 through META-FRASCO-		date of last revision December 26, 2019									
	0000002949		20, 2019									
1130	META-FRASCO-	1/30/2015	Facebook Data Policy, date of	Confidential								
	0000000962 through META-FRASCO-		last revision January 30, 2015									
	0000000966											
1131	META-FRASCO-	9/29/2016	Facebook Data Policy, date of	Confidential								
	0000000967 through META-FRASCO-		last revision September 29, 2016	5								
	0000000971											
1132	META-FRASCO-	9/21/2020	Instagram Data Policy, date of	Confidential								
	0000003245 through META-FRASCO-		last revision August 21, 2020									
	0000003253											
1133	META-FRASCO-	1/11/2021	Instagram Data Policy, date of	Confidential								
	0000003254 through META-FRASCO-		last revision January 11, 2021									
	0000003261											
1134	META-FRASCO-	1/30/2015	Facebook Statement of Rights	Confidential								
	0000000687 through META-FRASCO-		and Responsibilities, date of last revision January 30, 2015									
	0000000692		-									
1135	META-FRASCO-	4/19/2018	Facebook Terms of Service, date	Confidential								
	0000000693 through META-FRASCO-		of last revision April 19, 2018									
	0000000670											
1136	META-FRASCO-	7/31/2019	Facebook Terms of Service, date	Confidential								
	0000002586 through META-FRASCO-		of last revision July 31, 2019									
	0000002593											
1137	META-FRASCO- 0000002563 through	10/1/2020	Facebook Terms of Service, date of last revision October 1, 2020									
	META-FRASCO-		of last revision October 1, 2020									
	0000002571											
1138	GOOG-FLO-00020220		[GA4] Activate Google signals for Google				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
			Analytics 4 propertiesGoogle					052 CIAIIII				
			Signals									
1139	GOOG-FLO-00020185		[GA4] Data Collection				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1140	GOOG-FLO-00020063		Linking Google Ads and				S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
			Analytics					632 claim				
1141	GOOG-FLO-00020187	2022	[GA4] Set up Analytics for a website and/or app				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1142	GOOG-FLO-00000001		About the ad review process			1	O. Takabvirwa	Relevant to defending Plaintiffs' CIPA	-		-	
1142	COOC EL C 000772		M. Es l				S. C	632 claim				
1143	GOOG-FLO-00073218		Modify and create events				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1144	GOOG-FLO-00073263		Set up data collection for an app				S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
1145	GOOG-FLO-00019754	1/27/2016	Amouvement Acres consent			-	K. Lam	632 claim Relevant to defending Plaintiffs' CIPA				
1145	GOOG-FLO-00019/54	1/2//2016	Answers Agreement				K. Lam	Relevant to defending Plaintiffs' CIPA 632 claim	-			
	1	11	1	-1	1		I.	1	1	1	1	

Filing Order	Starting Bates No.	Document Dat	te Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1146	GOOG-FLO-00069181	2021	Data Sharing Settings		Witness	S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
1147	GOOG-FLO-00069153		Firebase - Data-Sharing Settings			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1148	GOOG-FLO-00057727	9/30/2019	Email with subject line: [Please	HC-AEO		K. Lam	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
			Read] Fabric Deprecation MSA set for Wed 10/2 10am est				632 claim				
1149	GOOG-FLO-00000060		Fabric Data Processing and Security Terms			K. Lam	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1150	GOOG-FLO-00078882		Analytics Settings - Firebase			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1151	GOOG-FLO-00065530		Firebase Help - Automatically Collected Events			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1152	GOOG-FLO-00078907		Firebase - How to Control Advertising Personalization			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1153	GOOG-FLO-00065468	11/17/2020	Google Analytics			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1154	GOOG-FLO-00065470	1/20/2021	Log Events			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1155	FLO-00002816	12/16/2016	Flo Privacy Policy (archived),			S. Schumacher	Relevant to defending Plaintiffs' CIPA	-		-	
			effective as of December 21, 2016				632 claim				
1156	FLO-00002942	3/14/2017	Flo Health Privacy Policy 3-14- 2017			S. Schumacher	Relevant to defending Plaintiffs' CIPA 632 claim	Duplicative of FLO- 00000183-00000185		-	
1157	GOOG-FLO-00020419		GA Data Retention			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1158	GOOG-FLO-00069055		Data Retention - Analytics Help			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1159	GOOG-FLO-00078886		Data Retention Help Center			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1160	GOOG-FLO-00065573		Data Collection - Firebase Help Page			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1161	GOOG-FLO-00000132		Google Ads Policies			O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1162	GOOG-FLO-00037744		Google Analytics			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1163	GOOG-FLO-00066082	9/12/2019	Policy requirements for Google Analytics Advertising Features			O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1164	GOOG-FLO-00078821		[GA4] Automatically Collected Events			S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
1165	GOOG-FLO-00019961		GA - Best Practices to Avoid			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1166	GOOG-FLO-00019479	1/22/2019	Sending PII Google Privacy Policy			S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
1167		10/2/2017	(1/22/2019 Version) Google Privacy Policy			S. Ganem	Relevant to defending Plaintiffs' CIPA	Authenticity		-	
1168	GOOG-FLO-00019545	4/17/2017	(10/2/2017 Version) Google Privacy Policy			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1169	GOOG-FLO-00078860	1/27/2017	(4/17/2017) [GA4] Exclude specific events			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
			and user-scoped custom dimensions from ads				632 claim				
1170	GOOG-FLO-00078941		personalization GOOG-FLO-00078941			S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
1171	GOOG-FLO-00000147	1/27/2017	GOOG-FLO-00000147			K. Lam	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1172	GOOG-FLO-00064216	8/24/2022		HC-AEO		S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA				
		0/24/2022	AEO)				632 claim				
1173	GOOG-FLO-00090410	12/5/2020	GOOG-FLO-00090410	HC-AEO		S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim			-	
1174	GOOG-FLO-00093786	12/5/2020	GOOG-FLO-00093786			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1175	GOOG-FLO-00000191	5/18/2016	Google Analytics for Firebase Terms of Service (5/18/2016 Version)			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1176	GOOG-FLO-00000205		Firebase Analytics Use Policy (5/18/2016 Version)			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1177	GOOG-FLO-00065818		GOOG-FLO-00065818			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1178	GOOG-FLO-00078883		GOOG-FLO-00078883			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	

Filing	Starting Bates No.	Document Dat	te Document Description	Confidentiality	Plaintiffs'	Plaintiffs' Exhibit Purpose	Defendants'	Defendants' Exhibit Purpose	Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
Filing Order				Designation	Sponsoring Witness		Sponsoring Witness					
1179	GOOG-FLO-00000161	4/17/2019	GOOG-FLO-00000161				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1180	GOOG-FLO-00000181	5/17/2017	GOOG-FLO-00000181				S. Ganem	Relevant to defending Plaintiffs' CIPA	-		-	
1181	GOOG-FLO-00000171	10/1/2018	GOOG-FLO-00000171				S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1182	GOOG-FLO-00000203	5/17/2017	GOOG-FLO-00000203				S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	Duplicative; already at		-	
1183	GOOG-FLO-00089138		GOOG-FLO-00089138 (HC-	HC-AEO			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	GOOG-FLO-00000181		-	
			AEO)	IIC-ALO				632 claim				
1184	GOOG-FLO-00000143		GOOG-FLO-00000143				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1185	GOOG-FLO-00078862		GOOG-FLO-00078862				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1186	GOOG-FLO-00000122		GOOG-FLO-00000122				O. Takabvirwa	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1187	GOOG-FLO-00089090		GOOG-FLO-00089090	HC-AEO			O. Takabvirwa	Relevant to defending Plaintiffs' CIPA	-		-	
1188	GOOG-FLO-00078898		Firebase - Data-sharing settings	3			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1189	GOOG-FLO-00076256	6/11/2019	GOOG-FLO-00078898 GOOG-FLO-00076256				S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
1190	GOOG-FLO-00076259	6/11/2019	GOOG-FLO-00076259				S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	_		_	
	G00G-1 E0-000/023/			0.01.11				632 claim				
1191		1/2/2023	2023-01-02 Jennifer Chen_s Amended Responses to RFA (So	Confidential et			J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1192		1/19/2023	1) 2023-01-19 Sarah Wellman's				S. Wellman	Relevant to defending Plaintiffs' CIPA	-		-	
1193		1/2/2023	R&Os to Googles ROGs 2023-01-02 Sarah Wellman s	Confidential			S. Wellman	632 claim Relevant to defending Plaintiffs' CIPA	-		-	
			Amended Responses to RFA (So					632 claim				
1194		1/2/2023	2023-01-02 Tesha Gamino_s	Confidential			T. Gamino	Relevant to defending Plaintiffs' CIPA	-		-	
			Amended Responses to RFA (So 1)	et				632 claim				
1195		1/9/2023	2023-01-09 Tesha Gamino's R&Os to Google's ROGs - Set 1	1			T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1196	GOOG-FLO-00078868	2022	GOOG-FLO-00078868				S. Ganem	Relevant to defending Plaintiffs' CIPA	_		-	
				HC AFO				632 claim				
1197	GOOG-FLO-00077991	6/1/2018	Firebase Event Names Doc - GOOG-FLO-00077991	HC-AEO			S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1198	GOOG-FLO-000378908	11/8/2022	GOOG-FLO-000378908				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-		-	
1199			[GA4] Demo account				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Rule 901 - authenticity not established			
1200			FloodIt Demo				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	Rule 901 - authenticity not established			
1201	GOOG-FLO-00019562	8/29/2016	Google Privacy Policy				S. Ganem	Relevant to defending Plaintiffs' CIPA	-			
1202	GOOG-FLO-00019535	12/18/2017	(8/29/2016 Version) - Ex. 28 Google Privacy Policy				S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-			
1203	GOOG-FLO-00000069		(12/18/2017 Version) Privacy and Terms page (GOOG	G-			S. Ganem	632 claim Relevant to defending Plaintiffs' CIPA	-			
1204	GOOG-FLO-0000074		FLO-00000069) Health/medicine advertising hel				O. Takabvirwa	632 claim Relevant to defending Plaintiffs' CIPA				
		0/11/2019	page (GOOG-FLO-0000074)	r				632 claim				
1205	GOOG-FLO-000911005	9/11/2018	GOOG-FLO-000911005				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1206	GOOG-FLO-00020216		GOOG-FLO-00020216				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1207	GOOG-FLO-00057427	6/25/2019	Firebase S2S Instead of SDK - GOOG-FLO-00057427				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1208		3/2/2021	Class Action Complaint (Chen Complaint) filed on March 2,				J. Chen	Relevant to defending Plaintiffs' CIPA 632 claim	-			
			2021									
1209		2/12/2021	Class Action Complaint (Wellman Complaint) filed on				S. Wellman	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1210		9/2/2021	February 12, 2021 Consolidated Class Action				J. Chen	Relevant to defending Plaintiffs' CIPA	_			
1210		). LI 2021	Complaint (ECF No. 64) filed of September 2, 2021	n			S. Wellman	632 claim				
			September 2, 2021		1		T. Gamino	1		1	1	

Case 3:21-cv-00757-JD Document 659-1 Filed 06/13/25 Page 115 of 115

Filing Order	Starting Bates No.	Document Date	Document Description	Confidentiality Designation	Plaintiffs' Sponsoring Witness	Plaintiffs' Exhibit Purpose	Defendants' Sponsoring Witness		Plaintiffs' Objections	Defendants' Response	Defendants' Objections	Plaintiffs' Response
1211		2/3/2021	Class Action Complaint (Gamino Complaint) filed on February 3,		Withess.		T. Gamino	Relevant to defending Plaintiffs' CIPA 632 claim	-			
			2021									
1212	GOOG-FLO-00073191		GOOG-FLO-00073191				S. Ganem	Relevant to defending Plaintiffs' CIPA 632 claim	-			
1213			Demo Account in Google				S. Ganem	Relevant to defending Plaintiffs' CIPA	Rule 901 - authenticity not			
			Analytics					632 claim	established			
			(https://www.youtube.com/watch									
			?v=h9bqUZP6AB0)									
1214			Google Analytics FloodIt! Demo,				S. Ganem	Relevant to defending Plaintiffs' CIPA				
			available to jurors via laptop.					632 claim	established			
1215	FLO-00098124	3/2/2023	Max Scrobov Depo Tr Vol. 1 -	Confidential							-	
			Ex. 170 (HC-AEO)									
1216	GOOG-FLO-00019788		GOOG-FLO-00019788								-	
1217		9/14/22	Roman Bugaev Depo Tr Vol. 1 -								-	
			Ex. 119									
1218		3/1/2023		HC-AEO							-	
			Vol. 1 - Ex. 146 (HC-AEO)									